(1)

United States Steel Corporation
Midwest Plant
6300 US Hwy 12
Portage, Indiana 46368

Spill Prevention, Control and Countermeasure Plan (SPCC Plan)

Storm Water Pollution Prevention Plan (SWPPP)

Distribution:
Hardcopy Binder – Midwest Plant Env Control Office
Hardcopy Binder – Gary Works Env Control Library
Electronic Copy – Environmental Control Dept Network Drives

Prepared by:
ST Environmental LLC
PO Box 2557
Chesterton, IN 46304
(219) 728-6312

Foreword

This binder contains the Spill Prevention, Control and Countermeasure (SPCC) Plan and the Storm Water Pollution Prevention Plan (SWPPP or SWPP Plan) for this facility. Facility maps, inventories, contacts, procedures and inspection checklists have been provided in the appendices for ease in the facilitation of revisions and for administrative purposes. The text of each plan is written as a separate document referring to the content of the appendices which address the common regulatory requirements of both plans.

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SPCC Plan Effective Date: 31 March 2017

(see Preface – Revision Log for revision history and status)

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1 - hardcopy binder, Environmental Control Office, Midwest Plant
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40 CFR 112, Appendix C, Attachment C-II
CERTIFICATION OF THE APPLICABILITY
OF THE SUBSTANTIAL HARM CRITERIA

FACILITY NAME: **U.S. Steel – Midwest Plant**
FACILITY ADDRESS: **US Hwy 12, Portage, IN 46368**

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   YES (NO)

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
   YES (NO)

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
   YES (NO)

4. Does the facility have a total oil storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance such that a discharge from the facility would shut down a public drinking water intake?
   YES (NO)

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last 5 years?
   YES (NO)

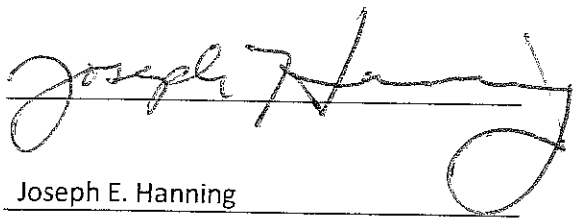
CERTIFICATION
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature — Director, Environmental Control (Title)

Joseph E. Hanning (Name (print or type)) — 31 March 2017 (Date)

Management Approval

I approve this Spill Prevention Control and Countermeasure Plan under level of authority to commit the necessary resources to fully implement the plan.

Signature: 

Name (Print): Joseph E. Hanning

Title (Print): Director, Environmental Control

Date: 31 March 2017

Professional Engineer Certification Statement

I attest that this Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and in accordance with 40 CFR Part 112. The procedures for required inspections and testing have been established. I have visited and examined the facility. Having had direct involvement in the development and writing of the plan, I find it is effective to satisfy the requirements of 40 CFR 112 and is adequate for the facility.

Signature: _____

Name: Susan S. Grenzebach

License Number: 10100855

License State: Indiana

Date: 31 March 2017

Seal:

U.S. STEEL – MIDWEST PLANT
SPCC PLAN

REVIEW AND REVISION LOG (112.5(b))

In accordance with 40 CFR 112.5(b), a complete review and evaluation of this SPCC Plan is conducted at least once every five years. As a result of this review and evaluation, the facility will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a discharge, and (2) if such technology has been field-proven at the time of review. Any amendment of the SPCC Plan shall be certified by a Professional Engineer within six months after a change in facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines (40 CFR 112.5(b)&(c)).

Revision Date	Reviewer	Type of Review (Check One)	Statement Required for 5 Year Review (not applicable to partial reviews or updates)	List Sections Changed or Amended
04/16/2004	Compl Mgr (USS), S.Grenzebach (OCS PE)	☐ Partial review ☒ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☒ will, or ☐ will not (check one), amend the plan as a result. ☐ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	Plan transition to new ownership from National Steel.
03/28/2005	R.Kreutzer (USS), S.Grenzebach (OCS PE)	☐ Partial review ☒ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☒ will, or ☐ will not (check one), amend the plan as a result. ☐ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	First rewrite based on changes to the SPCC Rules.
02/2006	J.Biancotti (USS), S.Grenzebach (OCS PE)	☐ Partial review ☒ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☒ will, or ☐ will not (check one), amend the plan as a result. ☐ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	Second rewrite based on changes to the SPCC Rules.

U.S. STEEL – MIDWEST PLANT
SPCC PLAN

REVIEW AND REVISION LOG (112.5(b))

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Revision Date	Reviewer	Type of Review (Check One)	Statement Required for 5 Year Review (not applicable to partial reviews or updates)	List Sections Changed or Amended
08/01/2008	A.Plewniak (USS), S.Grenzebach (OCS PE)	☐ Partial review ☒ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☒ will, or ☐ will not (check one), amend the plan as a result. ☐ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	Third rewrite based on changes to the SPCC Rules and Corp comments.
03/01/2009	A.Plewniak (USS), S.Grenzebach (OCS PE)	☒ Partial review ☐ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☐ will, or ☐ will not (check one), amend the plan as a result. ☒ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	Only change of mgmt authorization and Sub Harm Criteria Cert. No plan changes.
09/16/2011	A.Plewniak (USS), S.Grenzebach (OCS PE)	☐ Partial review ☒ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☒ will, or ☐ will not (check one), amend the plan as a result. ☐ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	Added oil-filled equip per 112.7(k). Updated inventory tables.

U.S. STEEL – MIDWEST PLANT
SPCC PLAN

REVIEW AND REVISION LOG (112.5(b))

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Revision Date	Reviewer	Type of Review (Check One)	Statement Required for 5 Year Review (not applicable to partial reviews or updates)	List Sections Changed or Amended
9/29/2011	A.Plewniak (USS), S.Grenzebach (STE PE)	☒ Partial review ☐ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☐ will, or ☐ will not (check one), amend the plan as a result. ☒ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	Added list of xformers & process tanks to App B; minor text update re insp of xformers & process units.
04/01/2013	A.Plewniak (USS), S.Grenzebach (STE PE)	☐ Partial review ☒ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☒ will, or ☐ will not (check one), amend the plan as a result. ☐ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	Complete review, update of storage inventory, maps, text revisions.
12/01/2015	M.Henry (USS), M.Taylor (USS), S.Grenzebach (STE PE)	☒ Partial review ☐ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☐ will, or ☐ will not (check one), amend the plan as a result. ☒ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	Update text; App B; App C; App D; App E.

U.S. STEEL – MIDWEST PLANT
SPCC PLAN

REVIEW AND REVISION LOG (112.5(b))

In accordance with 40 CFR 112.5(b), a complete review and evaluation of this SPCC Plan is conducted at least once every five years. As a result of this review and evaluation, the facility will amend the SPCC Plan within six months of the review to include more effective prevention and control technology if: (1) such technology will significantly reduce the likelihood of a discharge, and (2) if such technology has been field-proven at the time of review. Any amendment of the SPCC Plan shall be certified by a Professional Engineer within six months after a change in facility design, construction, operation, or maintenance occurs which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines (40 CFR 112.5(b)&(c)).

Revision Date	Reviewer	Type of Review (Check One)	Statement Required for 5 Year Review (not applicable to partial reviews or updates)	List Sections Changed or Amended
06/01/2016	M.Henry (USS), M.Taylor (USS), S.Grenzebach (STE PE)	☒ Partial review ☐ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☐ will, or ☐ will not (check one), amend the plan as a result. ☒ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	Update text; maps; etc
03/31/2017	M.Henry (USS), S.Grenzebach (STE PE)	☐ Partial review ☒ Complete Review (if a complete review is conducted, fill in the next column)	I have completed the 5-year review and evaluation of the SPCC Plan for this facility on this date, and ☒ will, or ☐ will not (check one), amend the plan as a result. ☒ Or completed review based on other factors. Signature: see preface plan mgmt & PE signatures/certifications	5-yr review; update text; maps; combine with SWPPP binder.

SPCC PLAN

SECTION 1. INTRODUCTION [112.1-6; 112.7(a)(1)and(2)]

This Spill Prevention, Control and Countermeasure (SPCC) Plan is prepared in accordance with 40 CFR 112 for the U.S. Steel (USS) Midwest Plant (MWP) facility located in Portage, Indiana. The applicability of this plan is established in accordance with 40 CFR 112.1 and 112.2. This Plan outlines the requirements for the prevention of discharges through the use of secondary containment structures and response, which together are designed to prevent the release of oil from entering navigable waterways. This plan has been designed to complement and work in conjunction with existing documents, internal programs, policies and procedures such as the Integrated Contingency Plan (ICP), the National Pollutant Discharge Elimination System (NPDES) Permit, Safety Policies, Emergency Plans, and Standard Operating Procedures.

This plan has been prepared in accordance with good engineering practices and has the full approval of management at a level with authority to commit the necessary resources (Preface). A licensed Professional Engineer (PE) provided oversight and actively participated in the development of this plan and has certified this plan in accordance with 40 CFR 112.3 (Preface).

Any amendments to this plan will be done in accordance with 40 CFR 112.5. We understand that amendments to this plan may also be requested by the EPA Regional Administrator in accordance with 40 CFR 112.4.

SECTION 2. FACILITY INFORMATION

Facility Description [112.7 (a)(3)and(a)(3)(i)]

The Midwest Plant is a steel finishing facility that receives raw steel coils to produce tin plated and chrome plated steel, galvanized steel, or cold rolled products. It is located in Portage, Indiana in northern Porter County. Surrounding land use is

industrial/commercial and railroad right-of-way. The site is a relatively flat area and has been extensively modified for industrial activity. Lake Michigan runs adjacent along the facility's northern property boundary and Burns Waterway runs adjacent along the facility's western property boundary. Industrial/commercial property runs adjacent to the facility's eastern property boundary and rail right-of-way runs adjacent to the facility's southern property boundary.

The applicable storage container and process unit inventories are provided in the tables located in Appendix B-1. Storage container information is summarized on this inventory and includes location descriptions and capacities. Changes to storage inventories may be identified by the following methods used at the facility:

- Regular task alerts sent to the plan's certifying professional engineer and environmental manager to review, analyze and certify any changes identified during inspections since the previous review.
- Regular task alerts to the compliance managers to review and inquire about any new or planned installations with the division managers.
- Process Change review process through the APEX Quality Management System (AQS).

The plant maintains piping and instrument diagrams (P&IDs) of manufacturing equipment and facilities which provide more detail than the diagrams presented in this SPCC Plan. Facility diagrams for container locations are provided in Appendix A-1. Maps include applicable storage containers, drum storage areas, transfer areas, process tanks/units and transformers. USEPA intended flexibility for mapping complicated facilities based on scale and practicality in accordance with *USEPA SPCC Guidance for Regional Inspectors, Section 6.4 Review of a Facility Diagram*. This guidance is provided in Appendix A-2. Particular excerpts with applicability for flexibility and discretion are as follows:

- "...the level of detail provided and the approach taken for preparing an adequate facility diagram is primarily at the discretion of the certifying PE..."
- "..In situations where diagrams become complicated due to the presence of multiple oil storage containers or complex piping/transfer areas at the facility, it may be difficult to indicate the contents and capacity of the containers on the diagram itself. In order to simplify the diagram, the PE may choose to include that information on a separate log or sheet maintained in the Plan, ..."
- "...Associated piping and manufacturing equipment present at an SPCC-regulated facility may be difficult to represent on a facility diagram, due to their relative location, complexity, or design. Recognizing this, EPA allows flexibility in the way the facility diagram is drawn...as long as more detailed diagrams of the systems are maintained at the facility..."

The maps in Appendix A-1 show the locations of tanks and containers marked with their identification numbers. These identification numbers coincide with the detailed information for each tank and container in the inventory tables provided in Appendix B-1.

For document control purposes, any printed copies of internal procedures or checklists are uncontrolled and are provided in this plan as reference only. The most current versions of procedures are available on the USS Gary Works intranet system.

Prevention of Discharges; Procedures [112.7(a)(3)(ii)]

Transfer procedures are posted and alarms are used at various locations to prevent discharge. There are several associated structured controls to prevent discharges, which are talked about in the next section. The facility also has the following procedures to prevent discharges to navigable waters:

- *70100003EMP Environmental Incident Reporting*

- *70100004EMP General Spill Cleanup Guidance*
- *70100005EMP Mobile Container Storage, Containment and Inspection*
- *70100008EMP Oil and Hazardous Substance Loading and Unloading Practices*

Control of Discharges; Equipment, Structures & Procedures [112.7(a)(3)(iii)]

Containment and structural controls can be found in the storage container inventory located in Appendix B-1. Tanks or containers located within a building may not have containments structures; however, the building structure and foundation acts as an engineered barrier and are at low risk of contaminating navigable waters.

Countermeasures for Discharges; Discovery, Response & Cleanup [112.7(a)(3)(iv)]

The facility has a procedure in place to report all releases in accordance with procedure *70100003EMP Environmental Incident Reporting*. All environmental incidents are reported and maintained on the facility's electronic incident reporting system.

Sorbent materials are readily available at certain oil transfer areas throughout the mill to assist in immediate containment of spilled oil. In addition, the facility has a fully equipped hazmat response vehicle and trained personnel to expedite containment of any large scale spill and countermeasure activities. The Gary Works facility has a fully equipped response vehicle and trained personnel to provide additional assistance as needed for large-scale releases and response in accordance with the Integrated Contingency Plan (available on the intranet).

Disposal of Recovered Materials [112.7(a)(3)(v)]

Any recovered materials are disposed of in accordance with both state and federal regulations.

Contact Lists and Phone Numbers [112.7(a)(3)(vi)]

Contact lists and phone numbers can be found in Appendix C.

Spill Reporting and Notification Procedures [112.7(a)(4)and(5)]

Sample procedures for general spill cleanup guidance and for environmental incident reporting are provided in Appendix F (refer to the facility's intranet for the most current procedures). All environmental incidents are reported and maintained on the facility's electronic incident reporting system. In addition to these procedures, Midwest is prepared with response equipment and trained personnel to provide first response to any releases at the facility. The Gary Works facility has a fully equipped response vehicle and trained personnel to provide additional assistance as needed for large-scale releases and response in accordance with the Integrated Contingency Plan (available on the intranet). The Environmental Control Department is responsible for any environmental agency reporting that may be required as the result of a release. Appendix C provides all contacts for reporting and notification.

Any discharges that have occurred at the facility are retained in the electronic environmental incident reporting system. All environmental incidents, including oil discharges, are communicated plant wide.

SECTION 3. EQUIPMENT AND CONTAINMENT

Equipment Failures [112.7(b)]

Although not all transfer areas are contained or equipped with a catch basin, the facility has equipped each of these areas with response kits that contain booms and absorbent materials in sufficient quantities to contain a worst case release. The facility is readily equipped to respond and remediate any impact of these types of releases and no impact to water systems would occur as a result of any of these types of failures or

release in accordance with the Integrated Contingency Plan (ICP) which is equivalent to a Facility Response Plan in accordance with 40 CFR 112.20. The facility has also conducted impact assessments under the requirements of the host facility's NPDES permit and has developed engineering solutions and best management practices to correct areas of impact. The results of these assessments and other information are included in the facility's Storm Water Pollution Prevention Plan (SWPPP) in accordance with the NPDES requirements. Release impacts are provided in Appendix B-1 and B-2 inventory tables.

Secondary Containments, Types Utilized [112.7(c)(i-vii)]

Appropriate containment and/or diversionary structures or equipment to prevent discharged oil from reaching navigable waterways have been provided at each storage container system. Each containment system is constructed such that no discharge from a release being held within the containment system will occur prior to the completion of cleanup activities. Tanks or containers located within a building may not have containments structures; however, they are located on top of an engineered barrier and have been assessed to have a low risk of contaminating navigable waters. (Refer to the container storage inventory in Appendix B-1 for a listing of secondary containment structures/methods.) Some containment and equivalent release prevention systems utilized are described below:

- Dikes, berms, and/or retaining walls sufficiently impervious to contain spilled oil are at several tank systems and storage locations at the plant.
- Curbing or drip pans are used in many areas to prevent indoor and outdoor oil storage releases from exiting a building structure or storage area.
- Sumps and collections systems are located in some areas at the facility that may contain releases and divert them to treatment facilities or retain releases locally.
- Culverts and gutters are not used at this facility for secondary containment purposes.

- Weirs, booms and other barriers are not specifically used as secondary containment structures at this facility. However, they are strategically located and accessible, in case of a release, to prevent impact to navigable waterways.
- Spill diversion ponds are not used for secondary containment at this facility.
- Retention ponds are not used for secondary containment at this facility.
- Sorbent materials are not specifically used as permanent containment structures but are used at transfer areas to contain spills or releases during transfer operations. They are readily accessible to the transfer areas throughout the mill. In addition, the facility has a fully equipped hazmat response vehicle and trained personnel to expedite any large-scale containment or countermeasure activities.

Oil Spill Contingency Plan [112.7(d)(1)and(2)]

This facility is not required to have a facility response plan in accordance with 40 CFR 112.20, however, it is covered and managed under the Gary Complex Integrated Contingency Plan (ICP) which contains all equivalent elements for an oil spill contingency plan.

SECTION 4. INSPECTIONS, TESTS, AND RECORDS [112.7(e)]

The plant has established a semiannual inspection program for all aboveground storage tanks, containers and storage areas (storing oil). Based on historic reports, the inspection program has shown to be done at an adequate frequency to provide data for preventive diagnostic evaluation to determine if an issue may cause a future potential release. An electronic checklist system is used as the procedure for the tank inspections. Asset inspection checklists are utilized in the field during inspections and the information gathered is entered into an electronic work order system. Weekly reports are generated with a list of assets inspected and a list of corrective work orders generated as a result of the inspections. Inspection records are signed electronically and maintained electronically for a minimum period of three years at the Environmental

Control Department. Diagnostic information gathered during the inspections are classified, and notifications of needed corrective actions may be made based on the severity of the classification assigned to it by the inspectors. Corrective work orders are approved by the Environmental Control Department and routed to the responsible area planners.

PCB transformers are visually inspected quarterly in accordance with 40 CFR 761. Non-PCB transformers are also inspected on a regular basis for operational and reliability status by electrical maintenance support contractors. Documentation is maintained for these inspections by the Environmental Control and Electrical Distribution Departments. All transformers have equivalent containment and are not required to be inspected as part of the SPCC program.

Process unit tanks are included as part of the various operation and maintenance programs throughout the mill and are regularly inspected and maintained. All process units have equivalent containment and are not required to be inspected as part of the SPCC program.

SECTION 5. PERSONNEL, TRAINING AND DISCHARGE PREVENTION

Training [112.7(f)(1)]

All personnel involved in oil or hazardous materials handling are instructed in proper operations and maintenance procedures for their job function. Additionally, all plant personnel are advised on discharge procedure protocols, SPCC regulations and the general content of the SPCC Plan via annual environmental bulletins in the safety packet. Documentation of training may be logged in the safety record keeping system, sign-in sheets or other area-specific tracking methods.

In addition to personnel briefings, training and exercise programs are in place to provide members of the Emergency Response Team with the basic knowledge, skills and practical experience necessary to achieve safe and effective spill response operations in accordance with the SPCC Plan and the ICP. Please refer to the ICP for details regarding training and drills for emergency response teams.

Spill Prevention Personnel [112.7(f)(2)]

The Environmental Control Department is responsible for coordinating spill response and spill prevention programs. The Manager of Environmental Control is accountable for discharge prevention and regularly reports to facility management.

Annual Spill Prevention Briefings [112.7(f)(3)]

Spill prevention briefings are conducted as part of the facility's spill prevention training program to ensure understanding of the SPCC Plan by operating personnel. These briefings are intended to highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. This training familiarizes both mechanical and operating personnel with the proper and most efficient spill prevention and control methods and the necessity for conformance with applicable regulations.

SECTION 6. SECURITY

Security and Facility Access [112.7(g)(1)]

USS-Midwest is accessible through one main vehicular gate and one pedestrian entrance. The vehicular gates are manned by uniformed guards at all times. Parties entering through pedestrian gates must use a facility issued magnetic swipe card to gain access to the facility. Natural barriers such as Lake Michigan to the north and Burns Waterway to the west, in combination with perimeter fences, prevent access to the site

through means other than via the plant gates and entrances discussed above. Midwest maintains a staff of security guards 24 hours per day, 7 days per week. These guards conduct periodic security checks throughout the facility, including a check of the perimeter.

Master Flow Valves and Drain Valves [112.7(g)(2)]

Drain valves are maintained in the closed position when not in use. Tank draining would only impact the containment system which is designed to retain the capacity of the tank. There are no tank drains that would cause the outward flow of the tanks contents to impact the surface or water systems directly. Tank drain valves are not publicly accessible. The plant is only accessible to authorized personnel.

Oil Pump Starter Controls [112.7(g)(3)]

Starter controls on oil pumps are located in areas accessible only to authorized personnel.

Idle Loading/Unloading Pipelines [112.7(g)(4)]

Transfer connections of oil pipelines are securely capped or blanked (whether full or emptied) when not in service or on standby service for an extended period.

Facility Lighting [112.7(g)(5)(i-ii)]

Plant lighting is sufficient for the discovery of spills occurring during the hours of darkness and for the prevention of spills that might occur through acts of vandalism.

SECTION 7. TANK CAR & TANK TRUCK LOADING/UNLOADING RACKS

Tank Car and Truck Loading/Unloading Rack Area Containment [112.7(h)(1)]

There are no tank car or truck loading/unloading racks at this facility. Containment is provided with impervious surfaces or structures sufficient to contain oil to the local area for any transfer activities. Spill response materials may be used for initial containment should a release occur. Additional onsite response equipment and personnel are readily available for additional assistance for large scale releases. A loading and unloading procedure has also been established to prevent discharges during loading and unloading operations (sample procedure in Appendix F).

Systems for Prevention of Accidental Disconnect Discharge [112.7(h)(2)]

Warning signs have been posted in all loading areas to caution drivers against vehicle departure before complete disconnect of transfer lines.

Tank Car and Truck Checks (Pre & Post Loading/Unloading) [112.7(h)(3)]

It is the responsibility of the driver to examine the lowermost drain and all outlets of the vehicle for leakage, and tightened, adjusted, or replaced to prevent liquid leakage while in transit.

SECTION 8. PRECAUTIONS FOR FIELD CONSTRUCTED CONTAINERS [112.7(i)]

There are no field constructed oil storage containers at this facility.

SECTION 9. CONFORMANCE WITH 40 CFR 112 AND STATE/LOCAL REGULATION [112.7(j)]

In accordance with State Regulation 329 IAC 2-10, any storage tanks or containers regulated under 40 CFR 112 are exempt from the requirements of 327 IAC 2-10. There

are currently no applicable local ordinances governing storage tanks or containers that do not already reference or incorporate the federal requirements.

SECTION 10. QUALIFIED OIL-FILLED EQUIPMENT & ALTERNATIVE REQUIREMENTS [112.7(k)]

This facility has had no single discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 gallons or no two discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 gallons within any twelve month period in the three years prior to the SPCC Plan certification date. All of the facility oil-filled equipment has equivalent secondary containment and most are located indoors on impervious surfaces. Electrical transformers located outdoors are all on impervious surfaces providing adequate containment a safe distance from water systems. The majority of transformers on site are PCB transformers that are subject to quarterly inspections in accordance with 40 CFR 761. Non-PCB transformers are also regularly inspected and tested for operational and reliability status. These various monitoring and inspection programs are adequate to detect critical equipment failure and/or discharges. That aside, the facility is also covered under the Gary Complex Integrated Contingency Plan (ICP) which is equivalent to an oil spill contingency and response plan.

SECTION 11. FACILITY DRAINAGE

Drainage from Diked Areas [112.8(b)(1)]

There are several diked storage areas at this facility which are restrained by valves or other means to prevent leakage into water drainage systems, however, there are no diked areas that have drainage valves positioned to drain into storm sewers.

Drain Valves in Diked Areas [112.8(b)(2)]

There are several diked storage areas at this facility which are restrained by valves or other means to prevent leakage into drainage systems, however, there are no diked areas that have drainage valves positioned to drain into storm sewers. Flapper type drain valves are not employed. None of the containment drains drain directly into storm sewers which would bypass the treatment facility.

Drainage Systems for Undiked Areas [112.8(b)(3)]

There are no undiked oil storage tanks or transfer areas with potential for run-off discharge into navigable waters. Additionally, Midwest security personnel provide first response containment activities which is followed up with the Gary Works Response Vehicle and personnel who are fully prepared and trained to respond to any releases at the facility in accordance with the Integrated Contingency Plan (available on the USS intranet).

Alternate Drainage System for Undiked Areas [112.8(b)(4)]

Alternate drainage or diversionary systems are not practicable or necessary for this facility based on the low risk of discharge from undiked areas.

Drainage Waters Treated in Two or More Units [112.8(b)(5)]

There are no cases where surface runoff (storm water runoff) drainage goes to more than one treatment unit at this facility.

SECTION 12. BULK STORAGE CONTAINERS

Container Material Compatibility & Storage Conditions [112.8(c)(1)]

All tanks used for the storage of oil at this facility are constructed of materials compatible with the material stored and with the conditions (temperature and pressure) under which it is stored.

Construction & Secondary Containments [112.8(c)(2)]

All bulk storage tank installations have been constructed with secondary containment sufficient to contain the entire contents of the largest single tank plus a minimum of 10 % freeboard to allow for the accumulation of precipitation for outdoor tanks. In the case of double-walled tanks located outdoors, freeboard space is not necessary. Indoor tanks without structural secondary containment are protected by building structures and may also be protected with basement structures below the main floor with sumps that convey wastewater to a treatment system designed to contain its maximum volume. Containment for each container is detailed in the inventory in Appendix B-1.

Drainage of Uncontaminated Rainwater from Dikes [112.8(c)(3)(i-iv)]

There are no diked areas with drain valves that are located in areas that would impact storm sewers. Therefore, there is no requirement for inspection and record keeping of the rainwater prior to draining or resealing of valves and drain plugs. Additionally, waters from diked areas will only be drained into the facility's wastewater treatment plant or removed by vac truck.

Buried Metallic Storage Tanks [112.8(c)(4)]

There are no buried metallic tanks at this facility.

Partially Buried Metallic Storage Tanks [112.8(c)(5)]

There are no partially buried metallic storage tanks that this facility.

Aboveground Container Integrity Testing [112.8(c)(6)]

Tanks designated for non-destructive testing were evaluated in accordance with good engineering judgment and in accordance with the settlement guidance resulting from Civil Action Nos. 02-02247 and 02-02254; *American Petroleum Institute vs EPA and Marathon Oil Company vs EPA*. This settlement allows for visual inspection of shop-built tanks with a volume of 30,000 gallons or less. Other factors that provide equivalent protection measures are also discussed in the settlement and can be used to determine whether non-destructive testing is necessary based on these factors.

Tanks not designated for non-destructive testing have characteristics that have been determined to provide adequate environmental protection. These characteristics include:

- shop-built tanks with 30,000 gallon capacity or less;
- proper secondary containment;
- no external insulation cover to allow visual inspection of tank shell;
- engineered barrier to prevent release of material; and
- no risk to storm water from a release.

Tanks not designated for non-destructive testing will be visually inspected on a regular basis as discussed on Section 4. Visual inspections provide good indication of impending defects and failure of the structure of the tanks and piping. The physical configuration, combined with regular inspections of each tank, ensures that any leak that could develop in the tank shell will be detected before it can become significant, escape secondary containment, or reach the environment. Visual inspections provide

appropriate and effective means of assessing the condition of the tank and its suitability for continued service.

Tanks designated for non-destructive testing at this facility are listed in Appendix E.

Internal Heating Coils [112.8(c)(7)]

Any steam or condensate generated from internal storage tank heating coils are not discharged into storm water systems and, therefore, do no impact discharge effluent.

Engineering of Containers to Prevent Discharges [112.8(c)(8)(i-v)]

Where practical, storage tanks installations are equipped with fail-safe systems to prevent overfilling. Where visual site gauges or electronic level devices are not employed, direct audible or signal communication between the tank gauger and the pumping station is utilized.

Observation of Effluent Treatment Facilities [112.8(c)(9)]

All outfalls are visually inspected on a daily basis by treatment plant personnel. These are documented on the turn logs.

Correction of Visible Discharges/Oil Losses [112.8(c)(10)]

Visible oil leaks from tank seams, gaskets, rivets and bolts sufficiently large to cause an accumulation of oil inside dikes or containment structures are reported, as needed, to the Load Dispatch or operations personnel and corrected as soon as practicable.

Mobile or Portable Storage Containers [112.8(c)(11)]

Mobile or portable storage tanks are not positioned in sensitive areas where impact to storm water systems may occur or in areas subject to periodic flooding or washouts. The facility has established an internal procedure for which all personnel must comply with when handling mobile or portable oil drums or storage tanks. This procedure, entitled *Mobile Container Storage, Containment and Inspection*, 70100005EMP, is provided in Appendix F.

SECTION 13. FACILITY TRANSFER OPERATIONS, PUMPING & FACILITY PROCESS

Buried Piping [112.8(d)(1)]

There is no buried oil piping at this facility.

Out of Service or Idle Terminal Connections [112.8(d)(2)]

Any pipes which are placed in idle or out of service status are or will be blank flanged or capped and marked as to its origin.

Pipe Supports [112.8(d)(3)]

Pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction.

Inspection of Valves, Piping & Appurtenances [112.8(d)(4)]

The general conditions of valves and pipelines are observed regularly during the visual tank inspections. Additionally, operating personnel frequently observe valves and piping during their normal shift including flange joints, expansion joints, pipe supports, valve glands and bodies, catch pans, locking of valves, where warranted, and metal surface conditions.

Prevention of Vehicle Damage to Piping [112.8(d)(5)]

Clearance signs are posted where overhead oil piping may be at risk for vehicular damage.

United States Steel Corporation
Midwest Plant
6300 US Hwy 12
Portage, Indiana 46368

Storm Water Pollution Prevention Plan (SWPPP)

Plan Effective Date: 31 Mar 2017

[Pursuant to NPDES Permit IN0000281, Effective April 1, 2016]

Prepared by:
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PO Box 2557
Chesterton, IN 46304
(219) 728-6312

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Non-Storm Water Assessment and Management Certification

All storm and non-storm water discharges are regulated under the facility's NPDES permit. These discharges are regularly monitored under the requirement of the NPDES permit. NPDES sampling is required on a daily, weekly and monthly basis for process water system outfalls and on a daily, weekly and quarterly basis for non-contact cooling water and storm water combined system outfalls. There are no storm water only discharge points at this facility and we believe the quarterly permit-required sampling events are sufficient to satisfy the non-storm water contribution assessment. These discharges are evaluated for: TSS, COD, Oil and Grease, Ammonia, Zinc and pH as indicated in Section 1.0 of this plan.

Detergent or solvent-based washing of equipment or vehicles that would allow wash water additives to enter any storm water sewer not appropriately permitted under the facility NPDES permit is strictly prohibited.

All interior maintenance area floor drains with the potential for maintenance fluids or other materials to enter storm water sewers are sealed or diverted to treatment facilities permitted under the facility's NPDES permit.

I certify storm water discharges entering waters of the state have been evaluated for the presence of illicit discharges and non-storm water contributions.

Joseph E. Hanning

Director, Environmental Control
U.S. Steel Gary Works
U.S. Steel Midwest Plant
U.S. Steel East Chicago Tin

Date: 31 March 2017

Review and Revision Log

Date of Review/Revision	Description of Review/Revision	Responsibility
01/21/2011	Formalization of current storm water pollution prevention activities into plan. Activities have been ongoing since 2001. No procedural changes to activities with this revision.	Water Compliance Mgr OCS Environmental
06/10/2011	Update Appendix B Source Inventory with additional sources; update SW Team list Appendix C to include contractor conducting SW inspections and plan maintenance.	Water Compliance Mgr OCS Environmental
03/01/2012	Update of all plan provisions based on new NPDES permit requirements effective 03/01/2011.	Water Compliance Mgr MW Compliance Mgr ST Environmental
06/21/2012	General text updates and revisions based on review; updates to App B, App C, App D, App E	Water Compliance Mgr MW Compliance Mgr ST Environmental
02/21/2013	Evaluate outfall foam risk and practices; update App B source tables; add new EMP to page 8 of text; update APP E; binder covers added denotation of hardcopy locations	Water Compliance Mgr MW Compliance Mgr ST Environmental
01/31/2014	Replace inventory and maps in App A & B; insert pest, herb, fert list in App D	Water Compliance Mgr MW Compliance Mgr ST Environmental
08/10/2015	Removal of Outfall 001 language	Water Compliance Mgr MW Compliance Mgr ST Environmental
03/31/2017	Updates based on new NPDES renewal permit	Water Compliance Mgr MW Compliance Mgr ST Environmental

SWPPP

[STORM WATER POLLUTION PREVENTION PLAN]

1.0 Introduction [Part I.E.1.]

This Storm Water Pollution Prevention Plan (SWPPP) was prepared in accordance with the United States Steel (USS) – Midwest Plant's (Midwest's) water discharge permit issued by the Indiana Department of Environmental Management (IDEM). This plan is written to ensure compliance with National Pollutant Discharge Elimination System (NPDES) Permit Number IN0000337 as indicated by citations referenced in the heading of each section. The purpose of this SWPPP is to identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges associated with industrial activity at the facility, describe practices to be used in reducing the potential for pollutants to be exposed to storm water, and to assure compliance with the terms and conditions of the NPDES permit. The SWPPP was designed to complement and work in conjunction with existing documents, internal programs, policies and procedures such as the Integrated Contingency Plan (ICP), Spill Prevention Control and Countermeasure (SPCC) Plan and Standard Operating Procedures.

2.0 Storm Water Pollution Prevention Team [Part I.E.2.(a)]

The SWPPP is administered and implemented by the Environmental Control Department. The Water Compliance Manager and the Environmental Compliance Manager for the Midwest Plant have the main responsibility for the implementation of the plan. They are responsible for providing structure and direction to the storm water management program. The Administrator is also responsible for the development of the plan and ensuring that the plan is regularly updated with assistance from the SWPPP team members. The various team members are responsible for development, implementation resources and ensuring that regular updates are completed when changes at the facility warrant revisions. The team members, contacts, and roles are listed in Appendix C of this plan.

3.0 Site Description - Facility Activities [Part I.E.2.(b)(1)]

Midwest is a steel finishing facility that receives raw steel coils to produce tin plated and chrome plated steel, galvanized steel, or cold rolled products. It is located in Portage, Indiana in northern Porter County. Surrounding land use is industrial/commercial and railroad right-of-way. The site is a relatively flat area and has been extensively modified for industrial activity. Lake Michigan runs adjacent along the facility's northern property boundary and Burns

Waterway runs adjacent along the facility's western property boundary. Industrial/commercial property runs adjacent to the facility's eastern property boundary and rail right-of-way runs adjacent to the facility's southern property boundary. Various activities and sources that can impact storm water throughout the facility have been surveyed and are detailed in the inventory tables in Appendix B.

4.0 Location Map [Part I.E.2.(b)(2)]

The general site location map from the U.S. Geological Survey (USGS) is provided in Appendix A-1.

5.0 Site Maps [Part I.E.2.(b)(3)]

Midwest has several mapping systems available that provide information on storm water systems, potential pollution sources, tank locations and other important information. Document control practices encourage the use of referencing site maps as needed to avoid duplication and use of maps in other plans which may not contain the latest revision. Site maps which meet the requirements of several plans may be referenced as a source to avoid document control errors such as maps included in the SPCC Plan and the Engineering Department plant system maps.

The site maps are provided in Appendix A-1 with corresponding Pollution Source Inventories in Appendix B-1 and B-2. They provide the following information, where applicable:

(A) Boundaries of the property and the size of the property in acres;

(B) Location and extent of significant structures and impervious surfaces;

(C) Directions of storm water flow;

(D) Locations of all storm water control measures;

(E) Locations of all receiving waters, including wetlands, in the immediate vicinity of the facility including waterbodies listed as impaired and identified by the State of Indiana or EPA as Tier 2 or Tier 2.5 waters.

(F) Locations of all storm water conveyances including ditches, pipes, and swales;

(G) Locations of potential pollutant sources;

(H) Locations where significant spills or leaks have occurred;

(I) Locations of all storm water monitoring points;

(J) Locations of storm water inlets and outfalls, and an approximate outline of the areas draining to each outfall;

(K) Municipal separate storm sewer systems and where your storm water discharges to them;

(L) Areas of federally-listed critical habitat for endangered or threatened species.

(M) Locations of the following activities where such activities are exposed to precipitation:

i. fueling stations;

ii. vehicle and equipment maintenance and/or cleaning areas;

iii. loading/unloading areas;

iv. locations used for the treatment, storage, or disposal of wastes;

v. liquid storage tanks;

vi. processing and storage areas;

vii. immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or byproducts used or created by the facility;

viii. transfer areas for substances in bulk; and

ix. machinery.

(N) Locations and sources of run-on to your site from adjacent property that contains significant quantities of pollutants.

(O) Identify in the SWPPP where any of the following activities may be exposed to precipitation or surface runoff: storage or disposal of wastes such as spent solvents and zinc dross; liquid storage tanks and drums; processing areas including pollution control equipment (e.g., filter presses); and storage areas of raw material such as scrap or metal in any form.

(P) An inventory of materials handled at the site that may potentially be exposed to precipitation or runoff and areas where significant deposition of particulate matter from process air emissions or material-handling activities are possible.

Only the larger areas of historic contamination are included on the site maps. Historic contamination sites and underground storage tanks were all identified and remediated through

clean closure under RCRA Corrective Action programs. These sites continue to be monitored as required under RCRA.

Topographical mapping was not provided because the terrain is relatively flat with steep drop off elevations present at the shoreline along Burns Waterway and Lake Michigan, therefore, these maps would have limited purpose. Both landfill areas have self-contained storm water collection systems that go into the waste water treatment system or percolates through the leachate collection system.

The Line Discharge Drawings (LDDs) provide an overview of all of the various discharges throughout the facility and is located in Appendix A-1. These drawings include point source drainage and areas of storm water runoff.

Appendix D provides a listing of various sites where pesticides, herbicides or fertilizers are applied in lieu of providing map locations. The table provided lists the general areas of use for pesticides, herbicides and fertilizers at the facility. The most recent data regarding quantities of application is available from the landscaping consultant. Each of the items listed is applied via manual application and is applied seasonally, as needed (the quantity applied varies). Herbicides may also be applied by plant personnel in very small areas within the plant as needed with a hand-held sprayer (consumer-scale application only).

6.0 Potential Pollutant Sources and Activities [Part I.E.2.(c)(1)&(2)]

Tables provided in Appendix B-1 and B-2 detail sources of potential storm water pollution as well as the location of each and includes the pollutant material types, typical quantities, methods of storage and remedial actions to reduce exposure, if any. Appendix B-1 provides listings for oil and fuel storage containers in accordance with SPCC Plan requirements. Appendix B-2 provides listings for all other potential storm water pollution sources. These tables are provided in lieu of narrative descriptions which would not provide enough detail to sufficiently describe all aspects of pollution sources and controls in place.

There are no outdoor manufacturing processes exposed to storm water as all manufacturing activities are located indoors. There are some outdoor areas where mobile equipment and vehicular activities occur (roads, parking lots, etc) and areas where loading and unloading of liquid materials occur that may have the potential to impact storm sewers. The landfill and oily waste pad areas are the only outdoor processing areas at the facility where industrial wastes are handled and disposed. These areas are covered under the facility's waste management permit (RCRA Part B) and has storm water runoff and containment systems that collect water for processing through their NPDES permitted waste water treatment system. There are no significant sources of fugitive dust emissions.

7.0 Spills and Leaks [Part I.E.2.(c)(3)]

Spill history was considered during planning, development and identification of pollution sources. Potential spills and leaks can occur anywhere throughout the facility. The potential pollution source inventories in Appendix B-1 and B-2 includes sources where potential spills may occur. Appendix B-1 lists all oil and fuel storage tanks and containers under the SPCC Plan provisions, and evaluates their potential impacts. There has been one reportable incident at Outfall 004 that occurred in April 2016 causing discoloration on Burns Waterway. The incident was due to a leaking Morg Oil Heat Exchanger which had released approximately three (3) gallons of soluble oil in the noncontact cooling water system which inadvertently reached the outfall discharge. The incident was communicated to plant personnel and the facility continues to monitor (analyze) heat exchangers on a regular basis. There are effective spill prevention programs in place throughout the facility.

8.0 Non-Storm Water Discharge [Part I.E.2.(c)(4)]

All storm and non-storm water discharges are comingled and regulated under the facility's NPDES permit. These discharges are regularly monitored under the requirement of the NPDES permit. NPDES sampling is required at mandated frequencies for process water, non-contact cooling water and storm water. There are no storm water only discharge points at this facility and the quarterly permit-required sampling events are sufficient to satisfy the non-storm water contribution assessment. Storm water (comingled) discharge monitoring is summarized in Section 17.0 of this plan.

9.0 Salt Storage [Part I.E.2.(c)(5)]

Salt for de-icing the roads is brought on-site during the winter months and is stored indoors at Warehouse 57 and/or the Refractory Shed (Salt Shed). The stored salt piles are not exposed to storm water.

10.0 Sampling Data [Part I.E.2.(c)(6)]

Storm water discharge monitoring data is summarized in Appendix I which includes data collected during the previous NPDES permit term (March 1, 2011 – February 28, 2016). Current storm water monitoring data and baseline comparisons are retained electronically on the Environmental Control Department network drive.

11.0 Control Measures to Meet TBELs [Part I.E.2.(c)(7)]

The facility is operated and maintained to minimize the exposure of storm water to potential sources of significant pollutant materials. This section provides descriptions of storm water pollution prevention controls and practices appropriate for Midwest. These controls are assigned to each potential pollution source provided in the inventories located in Appendix B-2. Non-structural control practices such as housekeeping, inspections, maintenance practices and training are also discussed in this section.

11.1 Structural Controls

Midwest employs several structural control options. The comprehensive tables in Appendix B-2 provide listings of structural and non-structural controls utilized for each potential pollution source where applicable. Listed below are some of the commonly used structural controls used at the facility.

Commonly Used Structural Controls:

- Plugged drain(s) in secondary containment dike(s) to prevent drainage of contaminated storm water
- Secondary containment such dikes, pallets, berms, double walls, etc
- Berms or diversionary walls/structures or swales
- Bank erosion control systems (rip-rap, sheet piling or other structures)
- Vegetation along banks and in open areas to prevent erosion and wash out

Commonly Used Structural Controls:

- Modified equipment such as valves, piping, flanges, etc. to prevent releases
- Raised, sealed or plugged storm sewer manhole(s)/inlet(s)/pipe(s) to prevent contaminated storm water from entering the storm sewer

11.1.2 Storm Water Treatment Facilities

The facility has a waste water treatment facility that treats some storm water which is comingled with process water through Outfall 104.

11.2 Non-Structural Controls and Practices

Midwest employs several non-structural control options and practices. The comprehensive tables in Appendix B-1 and B-2 provide listings of structural and non-structural controls utilized for each potential pollution source where applicable. Listed below are some of the commonly used non-structural controls used at the facility.

11.2.1 Non-Structural Controls and Practices Commonly Used

Commonly Used Non-Structural Controls and Practices:

- Follow procedures for loading and unloading operations
- Follow procedures for drum and mobile container(s) storage and handling operations
- Storage of oily and contaminated equipment and spare parts indoors and dispose of obsolete parts and equipment, where possible
- Truck and equipment washing operations only in designated areas
- Practice inventory controls for materials that are potential storm water pollutant sources
- Maintain a spill kits in the areas of concern
- Control traffic through the area to minimize tracking, deposition and runoff
- Regular inspections of oil storage tank systems in accordance with SPCC Plan
- Maintain drainage system culverts and piping to prevent flooding, specifically in areas that drain into storm water treatment systems
- Quarterly SWPPP inspections of designated SW pollution sources
- Regular maintenance outages and inspections
- Housekeeping practices

11.2.2 Non-Structural Control Practices in Accordance with Other Regulatory Programs

All new installations of tanks and/or containers storing oils or hazardous substances are required to meet secondary containment requirements in accordance with 327 IAC 2-10 and 40 CFR 112 in accordance as follows:

- 327 IAC 2-10 applies to any aboveground tanks storing liquid hazardous materials exceeding a capacity of 660 gallons constructed on or after May 28, 1999; and,
- 40 CFR 112 applies to facilities with an aggregate aboveground oil storage capacity of 1,320 gallons or greater.

Daily assessments of the effluent discharge systems are conducted by waste water treatment operators. The facility also conducts mandated monitoring, sampling and analysis in accordance with their NPDES permit. Hazardous waste storage areas are inspected daily or weekly in accordance with RCRA Subtitle C requirements. PCB transformers are inspected quarterly in accordance with 40 CFR 761.

12.0 Housekeeping and Maintenance [Part I.E.2.(d)(1)&(2)]

Each operating and maintenance area is responsible for housekeeping in strict accordance with safety requirements. Special and industrial waste receptacles are regularly managed by waste vendors for pickups and offsite disposal. Hazardous wastes are also managed by a waste vendor with personnel stationed onsite to conduct regular inspections and facilitate regularly scheduled pickup and offsite disposal activities. Under RCRA, hazardous wastes are not stored onsite for longer than 90 days unless it specifically meets exemptions under satellite container provisions. The onsite waste landfill is managed by the Environmental Control Department under a state issued waste management permit.

In order to minimize the storm water exposure to potential pollutant materials, various maintenance activities take place throughout Midwest, which include regular inspection and maintenance of operating equipment as well as mobile equipment. Each operating and maintenance department is responsible for their own respective areas. Secondary containment structures are emptied manually and taken to one of many on site waste water treatment facilities. No secondary containment systems are allowed to be drained into storm water

systems and most containment structures which have risk associated with pollution sources have permanently plugged drains.

13.0 Spill Prevention and Response Procedures [Part I.E.2.(d)(3)]

Proper procedures regarding: spill response and clean up; spill reporting; and routine maintenance and inspection of spill response/clean-up materials and equipment are outlined in the Gary Complex Integrated Contingency Plan (ICP). Oil spill prevention is outlined in the SPCC Plan. Spill prevention of other hazardous materials is obtained through physical control structures and numerous internal operating and maintenance procedures. All spills and incidents are reported internally and tracked through the electronic reporting system. The facility also has a fully-equipped hazardous materials and emergency response vehicle with highly trained manpower to expedite any type of emergency response events.

The facility has a Spill Prevention Control and Countermeasure (SPCC) Plan which details spill prevention policies and procedures, and response actions for all oil storage facilities. Uncontrolled copies of the following procedures are provided in Appendix F:

- *70100003EMP Environmental Incident Reporting*
- *70100004EMP General Spill Cleanup Guidance*
- *70100005EMP (Portable) Drum and Storage Tank Containment and Inspection*
- *70100008EMP Oil and Hazardous Substance Loading and Unloading Practices*
- *70100022EMP Effluent Water Quality Notification and Investigation*
- *70100024EMP Oil Sheen Response*

For document control purposes, refer to the appropriate USS network drives or electronic document management systems for the most recent versions of procedures and checklists.

14.0 Erosion and Sediment Control [Part I.E.2.(d)(4)]

The west side of the plant has had some historic erosion along Burns Waterway with washouts occurring during extreme rainfall events (well over five inches of rainfall during a short period of time) which have occurred a few times since 2001. These events are isolated and there are

no erosion problems commensurate with normal rainfall events. These historic washout events did not cause impedance of the waterway.

15.0 Training [Part I.E.2.(d)(5)]

Environmental and awareness training is provided to all employees on a variety of subjects which include topics relating to storm water pollution and prevention. A specific environmental bulletin on storm water pollution prevention training is also employed and is part of the existing overall training program. Training addresses the various topics such as spill response and prevention, good housekeeping, and material management practices.

16.0 Inspections [Part I.E.2.(e)]

The following inspections are conducted as part of the water pollution prevention measures at the facility.

Routine Facility Inspections			
Frequency	**Inspection**	**Description**	**Responsibility**
Quarterly	SWPPP inspections	Visual inspection of certain identified pollution source risk areas, see listings in Appendix B-2. Each year, one of these inspections are completed during a rain event.	USS Water Compliance Mgr ST Environmental, contractor
Quarterly	Visual assessment of storm water discharges	Visual assessment of discharges to indicate obvious signs of storm water pollution, e.g. color, odor, floating solids, foam, etc.	USS Water Compliance Mgr ALS, contractor
Quarterly	PCB inspections (TSCA)	Visual inspection of all PCB transformers and storage area for evidence of leaks or pending leaks.	USS Water Compliance Mgr USS MS&U Energy Mgr
Semiannually	SPCC inspections (OPA)	Visual inspection of all oil storage tanks and containers for evidence of leaks or pending leaks, see listings in Appendix B-1.	USS Compliance Mgr USS MS&U APEX Mgr
Annual	SW Review and Report	Review implementation of control measures including review of routine facility inspection documents; any applicable corrective action status; baseline monitoring results; and compliance status, see copies in Appendix H.	USS Water Compliance Mgr Water Compliance Contractors USS Div Mgrs

The corrective action system may be used to ensure that follow up activities are completed to resolve inspection findings. Completed inspections are retained electronically. Annual storm water report copies are provided in Appendix H.

17.0 Monitoring [Part I.E.2.(f)]

Midwest is permitted to discharge storm water, noncontact cooling water and treated process waters into Burns Waterway. Storm water sampling and analyses are done by a third party contractor. Contract personnel are responsible for ensuring samples are collected per the required method and at the required frequency. They are also responsible for conducting in-situ analyses for parameters that require immediate analyses (pH, total residual chlorine, etc) per the USEPA waste water analysis guidelines and standard methods. Their offsite laboratory is responsible for conducting analyses on the remaining parameters in strict accordance USEPA standard methods. Laboratory contract personnel prepares the monthly discharge monitoring reports (DMRs) for review and certification by USS management. USS management are responsible for reviewing analysis data, corrective action (when needed), certifying DMRs, and ensuring reports are submitted in accordance with regulatory requirements.

Most of the outfalls are combined water types (process water, noncontact cooling water, storm water, etc) and there are no "storm water only" outfalls or runoff monitoring points. The following table lists each outfall that is permitted to discharge storm water.

NPDES PERMITTED STORM WATER DISCHARGE MONITORING POINTS

Outfall	Parameter	NPDES Limit - Loading (lb/day)		NPDES Limit - Concentration (mg/L)		Sampling Frequency
		Monthly Avg	Daily Max	Monthly Avg	Daily Max	
OUTFALL 002	Oil & Grease	--	--	--	report	1x Weekly
	Total Residual Chlorine	0.04	0.09	0.01	0.02	Daily
	TSS	--	--	--	report	Quarterly
	COD	--	--	--	report	Quarterly
	Ammonia	--	--	--	report	Quarterly
	Zinc	--	--	--	report	Quarterly
	pH	--	--	Range 6.0 - 9.0 s.u.		1x Weekly
OUTFALL 003	Oil & Grease	--	--	--	report	1x Weekly
	Total Residual Chlorine	1.14	2.27	0.01	0.02	Daily
	TSS	--	--	--	report	Quarterly
	COD	--	--	--	report	Quarterly
	Ammonia	--	--	--	report	Quarterly
	Zinc	--	--	--	report	Quarterly
	pH	--	--	Range 6.0 - 9.0 s.u.		1x Weekly

18.0 SWPPP General Requirements [Part I.E.2.(g)]

This plan is retained onsite and is available for review in the Environmental Engineer's office. The SWPPP is amended whenever there is a change in design, construction, operation or maintenance at the facility that significantly changes the nature of pollutants discharged in storm water from your facility, or significantly increases the quantity of pollutants discharge, or upon written notice by the State that the SWPPP proves to be ineffective in achieving the general objectives of controlling pollutants in storm water discharges associated with industrial activity. Further, this SWPPP must be reviewed to determine if and where revisions may need to be made if the following conditions occur:

a. An unauthorized release or discharge (e.g., spill, leak, or discharge of non-storm water not authorized by this NPDES permit) occurs at your facility;
b. Your control measures are not stringent enough for the discharge to meet applicable water quality standards;
c. A required control measure was never installed, was installed incorrectly, or is not being properly operated or maintained;
d. Visual assessments indicate obvious signs of storm water pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam); or
e. The average of two semi-annual sampling results exceeds a baseline.

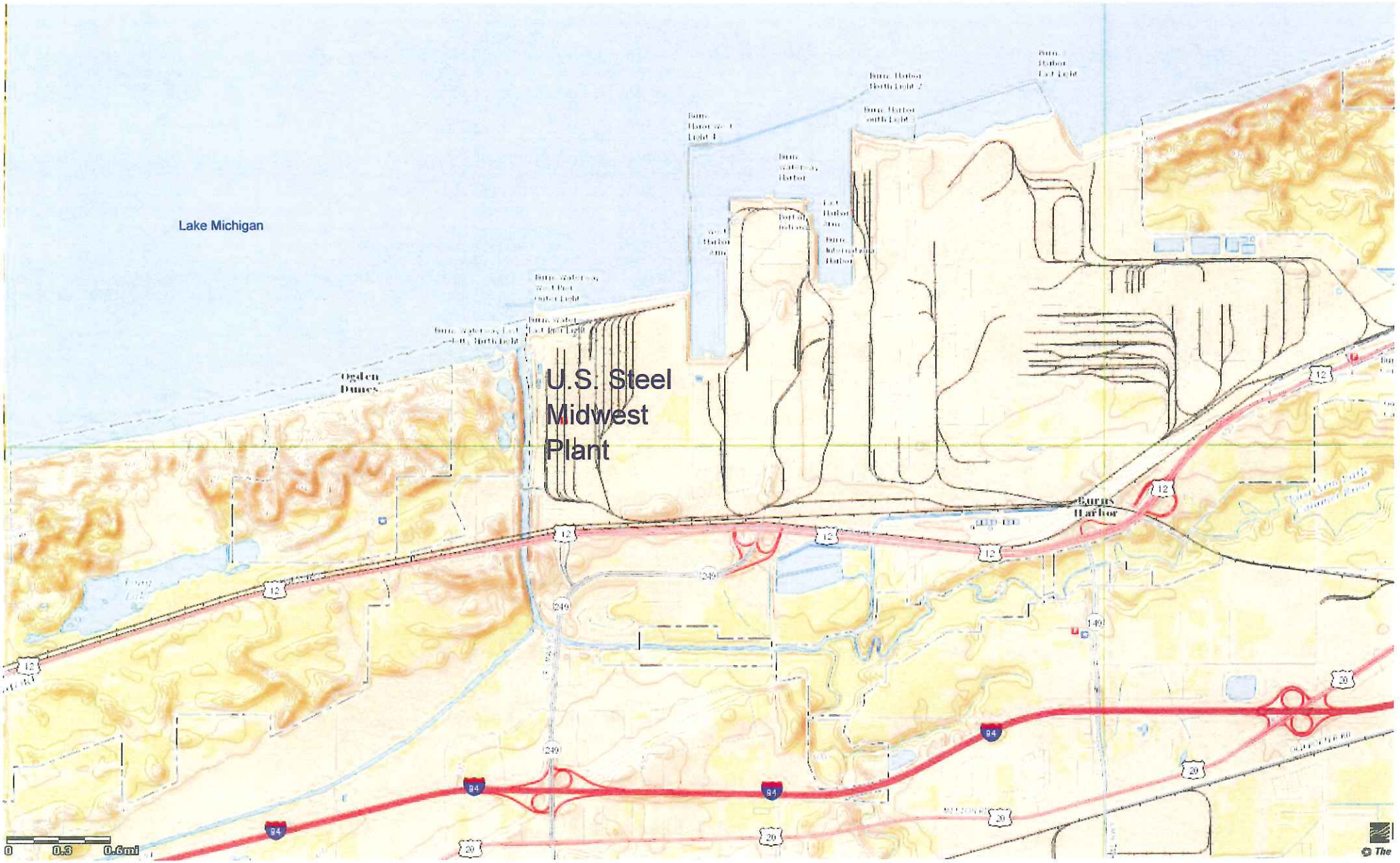
This plan was designed such that updates to the content to any of the appendices would not require a revision to the plan text or re-certification. It is designed to be a working document with regular updates which are documented in the Revision Log located in the Preface of this plan.

APPENDIX A-1

SITE MAPS

NOTES:

U.S. STEEL MIDWEST PLANT AND SURROUNDS



Open in The National Map Viewer

3/8/17 2:16 PM

U.S. Fish and Wildlife Service

National Wetlands Inventory

U.S. STEEL MIDWEST PLANT

March 8, 2017

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)

Soil Map—Porter County, Indiana
(SOIL SURVEY MAP)

Map Scale: 1:14,700 if printed on A portrait (8.5" x 11") sheet.

N

Meters: 0 200 400 800 1200

Feet: 0 500 1000 2000 3000

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 16N WGS84

Map Unit Legend

Porter County, Indiana (IN127)			
Map Unit Symbol	**Map Unit Name**	**Acres in AOI**	**Percent of AOI**
Du	Dune land	1.3	0.1%
Mm	Maumee loamy sand	6.1	0.5%
Mp	Milford silty clay loam, 0 to 2 percent slopes	34.9	3.1%
OaC	Oakville fine sand, 4 to 12 percent slopes	17.3	1.6%
OaE	Oakville fine sand, 18 to 40 percent slopes	32.5	2.9%
So	Suman silt loam	5.5	0.5%
UcG	Udorthents, loamy, 3 to 30 percent slopes	10.0	0.9%
UpB	Urban land-Psamments complex, 0 to 6 percent slopes	835.5	75.2%
W	Water	32.4	2.9%
We	Warners silt loam	29.8	2.7%
Totals for Area of Interest		**1,110.7**	**100.0%**

APPENDIX A-2

Excerpt from *USEPA SPCC Guidance for Regional Inspectors, Section 6 Facility Diagrams*

Chapter 6 Facility Diagram and Description

6.1 Introduction

Section 112.7(a)(3) of the SPCC rule requires that facility owners/operators include in the SPCC Plan a description of the facility, including a facility diagram that marks the location and contents of each fixed oil storage container and the storage area where mobile or portable containers are located. The facility diagram must also include all transfer stations and connecting pipes. The facility diagram is important because it is used for effective prevention, planning, management (for example, inspections), and response considerations. The diagram also will help the facility and emergency response personnel to plan for emergencies.

The rule also requires a description of the facility's oil storage containers, including their content and capacity. Providing information on a container-specific basis helps the owner or operator of the facility to prioritize inspections and maintenance of containers based on characteristics such as age, capacity, or location and helps to formulate contingency planning, if such planning is necessary. This information also helps inspectors to prioritize inspections of higher-risk containers at a facility and verify the facility capacity calculation. This chapter explains these requirements, provides guidelines on the necessary level of detail, discusses the discretion of the certifying PE or owner/operator in preparing the diagram, and includes several facility diagrams as examples.

Additionally, the SPCC Plan must also address discharge prevention measures; discharge or drainage controls; countermeasures for discharge discovery, response, and cleanup; methods of disposal of recovered materials; and specific contact information (see Section 112.7(a)(3) for more information on these requirements).

This chapter is organized as follows:

- ***Section 6.2*** outlines requirements for providing a general facility description that includes the physical layout, discharge prevention measures, drainage controls and countermeasures.
- ***Section 6.3*** describes the type of information that is necessary to enable a person to report a discharge to navigable waters or adjoining shorelines.
- ***Section 6.4*** describes the requirements for the facility diagram and specific types of containers.
- ***Section 6.5*** provides several examples of facility diagrams.
- ***Section 6.6*** describes the EPA inspector's role in reviewing facility diagrams.

6.2 General Facility Description

Section 112.7(a)(3) requires that the Plan include a description of the physical layout of the facility. This description may include information on the facility's location, type, size, geographic and topographic characteristics, and proximity to navigable waters, as well as other relevant information. This general facility description is supplemented with a more specific description of containers subject to the SPCC rule to complement what is illustrated on the facility diagram. This description must be included in the SPCC Plan regardless of whether similar information is available in the FRP or other facility plans. If the SPCC Plan does not follow the sequence of the rule, then a cross-reference is required.

6.2.1 Oil Types and Container Capacities

Section 112.7(a)(3)(i) requires that the Plan include the type of oil in each fixed container and its storage capacity. For mobile or portable containers, EPA provides flexibility in allowing the Plan preparer to either provide the type of oil and storage capacity for each container, or provide an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities.

The Plan preparer may identify an area on the facility diagram (e.g., a drum storage area) and include a separate description of the total number of containers, capacities, and contents in the Plan or reference facility inventories that can be updated by facility personnel. The Plan should include an estimate of the number of mobile or portable containers expected to be stored in an area and the capacity of each container. This estimate can be used to determine the applicability of the rule thresholds and provide a general description of the mobile/portable containers in the Plan (72 FR 58389, October 15, 2007). This estimate may be represented as a capacity range. For example, a facility with a 55-gallon drum inventory that fluctuates between 10 and 100 drums would represent a capacity range of 550 gallons to 5,500 gallons in the SPCC Plan.

6.2.2 Discharge Prevention Measures

The facility owner/operator must include in the SPCC Plan a discussion of discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers,

§112.7(a)(3)

... You must also address in your Plan:
(i) The type of oil in each fixed container and its storage capacity. For mobile or portable containers, either provide the type of oil and storage capacity for each container or provide an estimate of the potential number of mobile or portable containers, the types of oil, and anticipated storage capacities;

(ii) Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);

(iii) Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge;

(iv) Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor);

(v) Methods of disposal of recovered materials in accordance with applicable legal requirements; and

(vi) Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b).

Note: The above text is an excerpt of the SPCC rule. Refer to 40 CFR part 112 for the full text of the rule.

etc.). Including this information in the SPCC Plan will help to train new facility personnel on the discharge prevention measures to be employed at the facility and be useful for refresher training during annual discharge prevention briefings.

6.2.3 Drainage Controls

The Plan must also include a discussion of discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge.

The general secondary containment provision of §112.7(c) requires that secondary containment and/or diversionary structures be appropriate to prevent a discharge to navigable waters or adjoining shorelines. The owner/operator should discuss the method, design, and capacity for secondary containment that he chooses to address the typical failure mode, and the most likely quantity of oil that would be discharged. The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank, will not escape the containment system before cleanup occurs. The discussion should also include whether the secondary containment is either active or passive in design. If an active containment measure is employed, then the discussion should describe the equipment, procedures and personnel that will be necessary to effectively employ the active containment measure to prevent a discharge to navigable waters or adjoining shorelines.

Loading and unloading racks should have containment that flows to catchment basins or a treatment facility designed to handle discharges. Otherwise, the facility can include a quick drainage system for tank car or tank truck loading/unloading racks. Any containment system to address the loading/unloading rack must hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.

Finally, the description for bulk storage containers should address whether the secondary containment is sized to contain the capacity of the largest single container within the containment system with sufficient freeboard for precipitation.

6.2.4 Countermeasures

Include in the SPCC Plan a discussion of the facility's countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor). These countermeasures may include procedures for responding to a discharge that is discovered before it reaches navigable waters or adjoining shorelines (active containment measures used as part of a secondary containment strategy) as well as additional procedures for responding after a discharge reaches navigable waters or adjoining shorelines (contingency planning).

6.2.5 Disposal Methods

The SPCC rule requires that the owner/operator of the facility discuss the methods to be used to dispose of recovered materials in the event of a discharge. By describing those methods in the Plan, the owner/operator

demonstrates that the facility has done the appropriate planning to be able to dispose of recovered materials, should a discharge occur.

Proper disposal of recovered materials helps prevent a discharge as described in §112.1(b) by ensuring that the materials are managed in an environmentally sound manner. Proper disposal also assists response efforts. If the owner or operator of a facility lacks adequate resources to dispose of recovered oil and oil-contaminated material during a response, it limits how much and how quickly oil and oil-contaminated material is recovered, thereby increasing the risk and damage to the environment.

6.2.6 Contact List

The SPCC Plan must include a contact list that includes phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom the owner/operator has an agreement for response, and all appropriate Federal, State, Tribal and local agencies who must be contacted in case of a discharge to navigable waters or adjoining shorelines.

A contact list is necessary for both preparedness and response purposes because it enables the facility personnel to begin mobilizing resources immediately upon the discovery of a discharge to navigable waters or adjoining shorelines. The information included in the contact list should be reviewed periodically to ensure that the information is current.

6.3 Notification Requirements

The SPCC rule identifies the type of information to include in the SPCC Plan that is necessary to enable a person to report a discharge to navigable waters or adjoining shorelines. Additionally, in accordance with 40 CFR part 110.6, the owner/operator of the facility must report discharges to navigable waters or adjoining shorelines to the National Response Center (NRC) at 1-800-424-8802 or for those without "800" access 1-202-267-2675. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel (for more information see http://www.nrc.uscg.mil/). If reporting directly to NRC is not practicable, reports also can be made to the EPA regional office or the U.S. Coast Guard Marine Safety Office (MSO) in the area where the incident occurred.

§112.7(a)(4)

Unless you have submitted a response plan under §112.20, provide information and procedures in your Plan to enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge, the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and, the names of individuals and/or organizations who have also been contacted.

Note: The above text is an excerpt of the SPCC rule. Refer to 40 CFR part 112 for the full text of the rule.

The following information will be requested by the NRC:

40 CFR 110.6 Notice

Any person in charge of a vessel or of an onshore or offshore facility shall, as soon as he or she has knowledge of any discharge of oil from such vessel or facility in violation of section 311(b)(3) of the Act, immediately notify the National Response Center (NRC) (800–424– 8802; in the Washington, DC metropolitan area, 202–426–2675). If direct reporting to the NRC is not practicable, reports may be made to the Coast Guard or EPA predesignated On-Scene Coordinator (OSC) for the geographic area where the discharge occurs. All such reports shall be promptly relayed to the NRC. If it is not possible to notify the NRC or the predesignated OCS immediately, reports may be made immediately to the nearest Coast Guard unit, provided that the person in charge of the vessel or onshore or offshore facility notifies the NRC as soon as possible. The reports shall be made in accordance with such procedures as the Secretary of Transportation may prescribe. The procedures for such notice are set forth in U.S. Coast Guard regulations, 33 CFR part 153, subpart B and in the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR part 300, subpart E.

- The exact address or location and phone number of the facility;
- The date and time of the discharge, the type of material discharged;
- Estimates of the total quantity discharged;
- Estimates of the quantity discharged to navigable waters or adjoining shorelines;
- The source of the discharge;
- A description of all affected media;
- The cause of the discharge;
- Any damages or injuries caused by the discharge;
- Actions being used to stop, remove, and mitigate the effects of the discharge;
- Whether an evacuation may be needed; and
- The names of individuals and/or organizations who have also been contacted.

The same requirements for spill reporting are part of the FRP rule under 40 CFR 112.20; therefore, if a facility has prepared and submitted an FRP to the EPA Regional Administrator, then the SPCC Plan does not need to include a section on notifications.

6.4 Preparing a Facility Diagram

6.4.1 Purpose

The facility diagram is an important component of an SPCC Plan. It is used for prevention, planning, inspections, management, and response considerations. In most cases, the owner or operator of the facility will work with the PE certifying the SPCC Plan to identify the information to include on the facility diagram. The rule requires that the diagram identify the location and contents of each fixed oil storage container and location of mobile and portable container storage areas (§112.7(a)(3)). Diagrams may help responders avoid certain hazards by informing them of the location and content of containers and of the response equipment. The facility diagram may also assist responders in determining the flow pathway of discharged oil and to take more effective measures to control the flow of oil to potentially avert damage to sensitive environmental areas; protect drinking water sources; and prevent discharges to other conduits, to a treatment facility, or to navigable waters or adjoining shorelines. Federal and state facility inspectors and facility personnel need to be aware of the location of all containers, piping, and transfer areas subject to the SPCC rule. The diagram may also be used to visually address other rule requirements such as discharge/drainage controls and the flow path of a discharge (§112.7(a)(3)(iii) and 112.7(b), respectively). Additionally, the diagram may be attached to a facility inspection checklist to identify areas, containers, or equipment subject to inspection.

§112.7(a)(3)

Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each fixed oil storage container and the storage area where mobile and portable containers are located. The facility diagram must identify the location of and mark as "exempt" underground tanks that are otherwise exempted from the requirements of this part under §112.1(d)(4). The facility diagram must also include all transfer stations and connecting pipes, including intra-facility gathering lines that are otherwise exempted from the requirements of this part under §112.1(d)(11).

Note: The above text is an excerpt of the SPCC rule. Refer to 40 CFR part 112 for the full text of the rule.

6.4.2 Tier I Qualified Facility Exclusion

In 2008, EPA promulgated streamlined requirements for Tier I qualified facilities that exclude the requirement for a facility diagram. This subset of qualified facilities (i.e., those with no individual container greater than 5,000 U.S. gallons in capacity) is eligible to complete an SPCC Plan template that follows the format outlined in Appendix G of the SPCC rule. EPA determined that a facility diagram is not necessary because this type of facility is typically small and generally simple in configuration. A facility diagram is not needed to understand the facility layout and locate areas of potential discharge at such facilities.

The facility diagram exclusion applies only for Tier I qualified facilities. The owner or operator of a Tier II qualified facility is required to develop and certify an SPCC Plan that complies with all of the applicable requirements of section §112.7 and subparts B and C of the rule. For more information on qualified facilities see

the discussion in *Chapter 1: Introduction, Sections 1.3.3 and 1.3.4*. Additional guidance is also available for qualified facility owners/operators at http://www.epa.gov/oem/content/spcc/spcc_qf.htm

6.4.3 Requirements for a Facility Diagram

The facility diagram is one of the general requirements for an SPCC Plan. Facility diagrams provided as part of an SPCC Plan illustrate a variety of information. The following items are required by §112.7(a)(3):

- Aboveground storage tanks (including location and contents);
- Underground storage tanks (including location and contents). This includes those that are subject to the SPCC rule or those that are exempt (see *Section 6.4.7*);
- Storage area(s) where mobile or portable containers are located (see *Section 6.4.6*);
- Transfer stations such as oil transfer areas including loading/unloading racks and loading/unloading areas;
- Oil-filled equipment such as hydraulic operating systems or manufacturing equipment (including location and contents);
- Oil-filled electrical transformers, circuit breakers, or other equipment (including location and contents);
- Connecting piping (if the scale of drawing permits, as discussed in *Section 6.4.9*);
- Oil pits or ponds (at oil production facilities);
- Oil production facility stock tanks, separation equipment and produced water containers;
- Any other bulk storage or oil-filled operational equipment at an oil production facility; and
- Flowlines and intra-facility gathering lines at a production facility (this includes those that are subject to the SPCC rule and exempt intra-facility gathering lines subject to the requirements of 49 CFR part 192 or 195 as described in §112.1(d)(11)).

Containers that have a capacity of less than 55 gallons, are permanently closed, or are otherwise exempt from the rule (with the exception of exempt underground tanks and exempt intra-facility gathering lines) are not required to be identified on the facility diagram.

In addition, EPA recommends (but does not require under the SPCC rule) that the following information be included on the facility diagram to maximize its utility for facility personnel, emergency responders, and inspectors:

- Aboveground storage tank capacities and/or tank identification numbers or letters;

- Secondary containment structures, including oil/water separators used for containment;
- Storm drain inlets and surface waters that could be affected by a discharge;
- Direction of flow in the event of a discharge (which can serve to address the SPCC requirement under §112.7(b));
- Legend that indicates scale and identifies symbols used in the diagram;
- Location of response kits or other equipment used to implement an active containment strategy:
- Location of firefighting equipment and pipe stands for foam application;
- Location of valves or drainage system control that could be used in the event of a discharge to contain oil on the site;
- The location of important piping appurtenances such as valves, checks or other piping-related equipment (to aid in facility response and inspection efforts);
- Compass direction indicating north; and
- Topographical information and area maps.

For purposes of emergency response, EPA recommends, but does not require, that an owner/operator mark on a facility diagram containers that store Clean Water Act (CWA) hazardous substances (listed in 40 CFR part 116, Designation of Hazardous Substances) and label the contents of these containers (67 FR 47097, July 17, 2002).

While recognizing that SPCC Plans and their associated diagrams are facility-specific and prepared within the discretion granted to the Plan preparer, the information provided in this chapter is meant to facilitate a common understanding of what EPA inspectors may expect to see in a facility diagram. The remainder of this section provides guidelines for the recommended level of detail, how specific containers and systems may be addressed and the use of various approaches to develop facility diagrams that meet the requirements of §112.7(a)(3).

6.4.4 Level of Detail

The facility diagram should provide sufficient detail for the facility personnel to undertake prevention activities, for EPA to perform an effective inspection, and for responders to take effective measures. As with other aspects of the SPCC Plan, the facility diagram is to be prepared in accordance with good engineering practice. Thus, the level of detail provided and the approach taken for preparing an adequate facility diagram is primarily at the discretion of the person certifying the SPCC Plan.

The scale and level of detail shown on a facility diagram may vary according to the needs and complexity of the facility (72 FR 58389, October 15, 2007). Owners or operators of a facility may represent complicated areas of piping or oil-filled equipment in a less detailed manner on the facility diagram in the SPCC Plan, as long as the information is contained in more detailed diagrams of the systems or is contained in some other form and such information is maintained elsewhere at the facility and this location is referenced in the SPCC Plan (73 FR 74247, December 5, 2008). For example, a facility owner or operator may indicate in the diagram an area where complicated oil-filled equipment (such as manufacturing equipment found in a refinery or other oil processing facility) is located and provide a table in the Plan describing the type(s) of equipment and contents of the oil storage containers.

The facility diagram must include all fixed and mobile/portable containers (including oil-filled equipment) that store 55 gallons or more of oil and identify the contents of these containers (§112.7(a)(3)). (The SPCC rule exempts containers with a capacity less than 55 gallons, and therefore they should not be included on the facility diagram.) The following sections provide information on identifying mobile or portable containers, completely buried storage tanks, and piping and manufacturing equipment on the facility diagram.

6.4.5 Fixed Storage Containers

In 2008, EPA amended the SPCC rule to clarify that the facility diagram must include the location of all containers located in a *fixed* position (i.e., those that do not move around the facility). In situations where diagrams become complicated due to the presence of multiple oil storage containers, it may be difficult to indicate the contents of the containers on the diagram itself. In order to simplify the diagram, the owner or operator may choose to include the contents of the containers separately in the SPCC Plan in an accompanying table or key. See *Section 6.2.1* for more information on the requirement to describe the facility's oil storage containers, including contents and capacity

6.4.6 Mobile or Portable Containers

The owner/operator must mark the storage area of mobile or portable containers on the facility diagram (§112.7(a)(3)). Mobile or portable containers should be marked on the facility diagram in their out-of-service or designated storage area, primary storage areas, or areas where they are most frequently located (see 73 FR 74247, December 5, 2008). Thus, if containers are stored in one area and operated in another area, both "areas" would be identified on the facility diagram. However, since the rule requires the identification of a "storage area", these "areas" may be marked as general locations on the diagram rather than identify specific discrete locations for each mobile or portable container. Regardless of where mobile or portable containers are located at the facility, the owner/operator must comply with the specific secondary containment requirements for these containers as described in §§112.8(c)(11) and

Tip – Mobile or portable containers

While the SPCC rule does not specifically define "mobile" or "portable" containers, such containers may include 55-gallon drums, skid tanks, totes, Intermediate Bulk Containers (IBCs), and other small containers put into place and later moved. Mobile/portable maintenance tanks, and some oil refinery tank trucks and fueling trucks dedicated to a particular facility (such as a construction site, military base, or similar large facility) may also fall under this category.

(73 FR 74246-7, December 5, 2008)

112.12(c)(11). See *Chapter 4: Secondary Containment and Impracticability, Section 4.7.5* for a discussion of these requirements.

For mobile or portable containers (e.g., drums, IBCs and totes), the facility owner/operator may note the general contents of each container and provide more detailed content information separately (such as on a separate sheet, log, or electronic system). If the contents of a container change frequently, the contents may be recorded separately, or on the diagram. If the information is provided separately, the diagram should note that contents vary. See *Section 6.2.1* for more information on the requirement to describe the facility's oil storage containers, including contents and capacity.

6.4.7 Underground Storage Tanks

A facility diagram must include the location and contents of *all* containers addressed in the SPCC Plan (67 FR 47097 and §112.7(a)(3)). This requirement includes both exempt underground storage tanks (USTs) and USTs that are subject to SPCC requirements. Completely buried USTs and piping systems that are subject to all technical requirements of either 40 CFR part 280 or an approved state UST program under 40 CFR part 281 are exempt from SPCC requirements. However, USTs must be included in the facility diagram and marked "exempt" if the facility is otherwise subject to the SPCC rule. Similarly, the SPCC rule exempts USTs including below-grade vaulted tanks that supply emergency diesel generators at a nuclear power generation facility licensed by the Nuclear Regulatory Commission (see *Chapter 2: SPCC Rule Applicability, Section 2.8.4*). Such emergency generator tanks must be included in the facility diagram and marked "exempt" if the facility is otherwise subject to the SPCC rule. This information will help response personnel to easily identify dangers from fire, explosion, or physical impediments during response activities.

As discussed in *Chapter 2: SPCC Rule Applicability, Section 2.8.3*, a facility may have USTs that are subject to SPCC requirements because they are deferred from compliance with some or all of the technical requirements of 40 CFR part 280 (e.g., UST systems with field constructed tanks and airport hydrant fuel distribution systems). USTs that are subject to SPCC requirements must be marked on the facility diagram (§112.7(a)(3)). (See 56 FR 54612, October 22, 1991.)

6.4.8 Intra-facility Gathering Lines

The facility diagram must include all transfer stations (i.e., any location where oil is transferred) and connecting pipes, including intra-facility gathering lines that are otherwise exempted from SPCC requirements (§112.7(a)(3)). Although the SPCC rule exempts those intra-facility gathering lines that are subject to the regulatory requirements of 49 CFR part 192 or 195, their location must be identified and marked as "exempt" on the facility diagram (§112.1(d)(11)). This will assist facility, EPA, and emergency personnel to review the facility's SPCC Plan and identify hazards during a spill response activity.

6.4.9 Piping and Oil-filled Equipment

Oil-filled equipment (such as manufacturing equipment) and associated piping present at an SPCC-regulated facility may be difficult to represent on a facility diagram, due to their relative location, complexity, or

design. Recognizing this, EPA allows flexibility in the way the facility diagram is drawn. An owner/operator may represent such systems in a less detailed manner on the facility diagram as long as more detailed drawings are maintained at the facility and referenced in the SPCC Plan. More detailed drawings may include blueprints, engineering diagrams, or diagrams developed to comply with other local, state, or federal requirements.

The scale and level of detail of the facility diagram may make it difficult to show small transfer lines or piping within containment structures. Schematic representations that provide a general overview of the piping service (e.g., supply/return) may provide sufficient information when combined with a description of the piping in the Plan. Alternatively, overlay diagrams showing different portions of the piping system may be used where the density and/or complexity of the piping system would make a single diagram difficult to read (73 FR 74248, December 5, 2008). Although the SPCC rule requires that piping be included on the facility diagram, it is not necessary to include appurtenances associated with the piping.

Figure 6-1 and *Figure 6-2* demonstrate simplified examples of oil-filled equipment and piping as shown in a complete facility diagram in *Figure 6-4*. Examples of ways that oil-filled manufacturing equipment may be represented include a box that identifies the equipment and its location, or a simplified process flow diagram. For areas of complicated piping, which often include different types, numbers, and lengths of pipes, the facility diagram may show a simplified box labeled "piping" or show a single line that identifies the service (e.g., supply/return), as long as more detailed diagrams are available at the facility (73 FR 74248, December 5, 2008).

Figure 6-1: Example of a facility diagram showing how manufacturing equipment could be represented. Note that more detailed diagrams would need to be available at the facility.

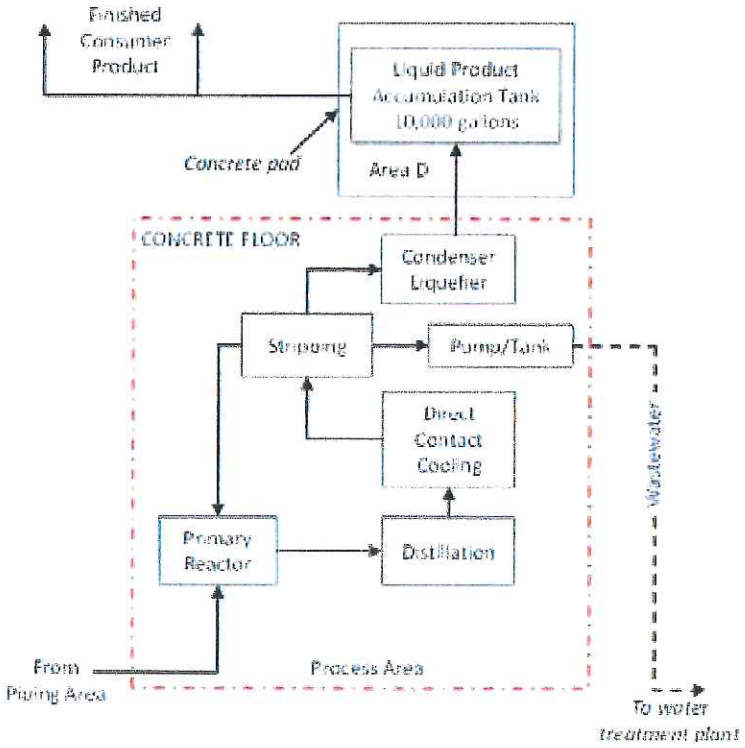
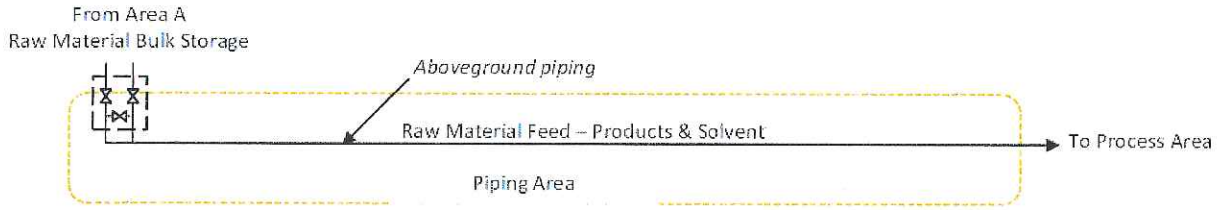


Figure 6-2: Example showing how a complex piping area could be represented in a facility diagram. Note that more detailed diagrams would need to be available at the facility.



6.4.10 Use of Diagrams Created for Other Programs or Uses

EPA does not require that a facility diagram be developed exclusively for the SPCC Plan. Some state and other federal regulations may require a diagram with similar or overlapping requirements. States may supplement the SPCC minimum requirements with more stringent requirements. A facility diagram prepared for a state or other federal plan (including the FRP requirements under §112.20) or for other purposes (e.g., as-built plans, construction permits, facility modifications, and other pollution prevention requirements) may be used in an SPCC Plan if it meets the requirements of the SPCC rule (e.g., it includes the contents of the containers, transfer areas, and piping) (73 FR 74247, December 5, 2008). Similarly, facilities with oil-filled electrical equipment may base their facility diagrams on existing electrical one-line diagrams, provided the drawings are appended as necessary to include all of the containers, transfer areas, piping, and other information as required to meet the requirements of §112.7(a)(3).

6.5 Facility Diagram Examples

This section includes example facility diagrams for three fictitious SPCC-regulated facilities. They illustrate how certain containers and equipment could be represented on a facility diagram. Preparation of a facility diagram is a site-specific effort, and the level of detail and/or approach taken to prepare it will vary based on what is needed to adequately describe the configuration for any given facility. The examples provided are not meant to indicate a specific amount of detail an EPA inspector will require for each SPCC-regulated facility. They merely illustrate the concepts discussed in this chapter.

Facility diagrams, like the other elements of an SPCC Plan, must be prepared in accordance with good engineering practice or in accordance with accepted and sound industry practices and standards. They must be reviewed by the PE (or owner/operator, in the case of a Tier II qualified facility) certifying the Plan (§112.3(d) or §112.6(b)). Section 112.7(a)(3) requires the facility diagram to show, at a minimum, the location and contents of fixed oil containers; mobile/portable container storage area locations; completely buried storage tanks, including those that may otherwise be exempt from the rule; and transfer stations (i.e., areas where oil is transferred) and connecting pipes, including exempt intra-facility gathering lines. The facility owner or operator may also include on the diagram additional structures and equipment, and may use the diagram to illustrate other elements that may be relevant to the SPCC Plan and to emergency response. For instance, a diagram may also show the discharge and drainage controls that are described in the SPCC Plan, the predicted flow path for discharged oil based on topography, areas on which to focus inspections, fire-fighting resources, spill response kits or other equipment necessary to implement an active containment measure and/or evacuation routes. The examples presented below are for a bulk storage and distribution facility, a manufacturing facility, and an oil production facility.

6.5.1 Example #1: Bulk Storage and Distribution Facility

Figure 6-3 illustrates a diagram for a bulk storage and distribution facility, which has a tank farm, a loading rack, an unloading area, and other oil containers and oil-filled equipment. This diagram corresponds to the model SPCC Plan for a bulk storage distribution facility that is provided in *Appendix D* of this guidance.

As required by §112.7(a)(3), this diagram includes all containers with an oil storage capacity of 55 gallons or greater. In addition to listing the contents directly on the diagram, the diagram provides a reference to a supplementary table that contains the volume and content of the storage tanks shown on the diagram (appended to the diagram as Table B-1). At the discretion of the Plan preparer who reviewed and certified the Plan, the example facility diagram also depicts secondary containment methods and includes a reference to calculations for secondary containment capacity provided in other parts of the SPCC Plan. Also, a separate log (Table B-2) identifies the contents of the drums in the storage warehouse and estimates the maximum number of containers.

Figure 6-3: Example facility diagram, including a loading rack and a separate loading area.

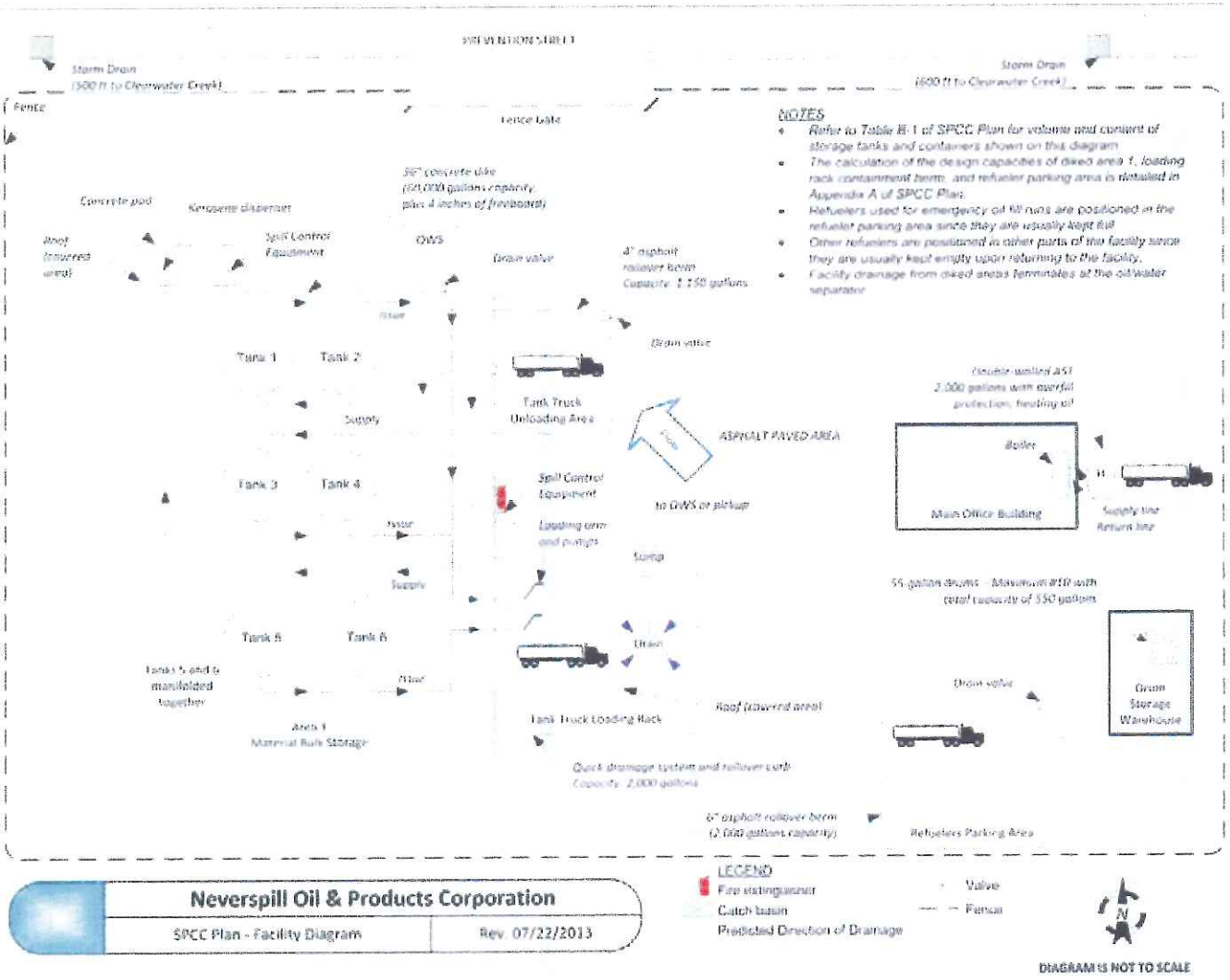


Table B-1: Volume and contents of containers identified on the facility diagram.

Tank/Container	Volume (gallons)	Contents
Area 1		
Tank 1	25,000	Product A – #2 fuel oil
Tank 2	25,000	Product A – #2 fuel oil
Tank 3	25,000	Product B – #6 fuel oil
Tank 4	25,000	Product B – #6 fuel oil
Tank 5	30,000	Product C – Kerosene
Tank 6	30,000	Product C – Kerosene
Main Office Building		
Tank H	2,000	Heating oil
Drum Storage Warehouse		
Up to 10 drums	55 (each)	Various oil products (lubricating oil, engine oil, used oil, etc.)

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Table B-2: Drum storage warehouse log (maintained at the facility as part of inventory).

Date	Number and Type of Container	Contents	Capacity	Location at facility

6.5.2 Example #2: Manufacturing Facility

Figure 6-4 illustrates a large manufacturing facility with a variety of containers and equipment, including piping, oil-filled equipment (i.e., manufacturing equipment and transformers), and completely buried storage tanks. As required by §112.7(a)(3), this diagram includes all containers with a storage capacity of 55 gallons or greater. In addition to listing the contents directly on the diagram, it includes a reference to a crosswalk that contains the volume and content of the storage containers shown on the diagram (appended to the diagram as Table B-3). While not an SPCC requirement, the diagram also marks the location of containers that store CWA hazardous substances and labels those containers. Additionally, the diagram notes the location and contents of completely buried storage tanks otherwise exempt from the SPCC rule because they meet all the technical requirements of 40 CFR part 280 or an approved state UST program under 40 CFR part 281 (in accordance with the requirements of §112.7(a)(3)).

This diagram also includes an example of how oil-filled manufacturing equipment and complex piping may be represented on a facility diagram, at the discretion of the owner/operator or PE. The diagram references the more detailed diagrams and plans of the piping and manufacturing equipment that are available separately at the facility.

Finally, while not required in the diagram, this example also includes a reference to the calculation of diked storage provided in other parts of the SPCC Plan and depicts wastewater treatment systems, secondary containment, and oil/water separators.

Figure 6-4: Example facility diagram, including oil-filled equipment, complex piping, and completely buried storage tanks.

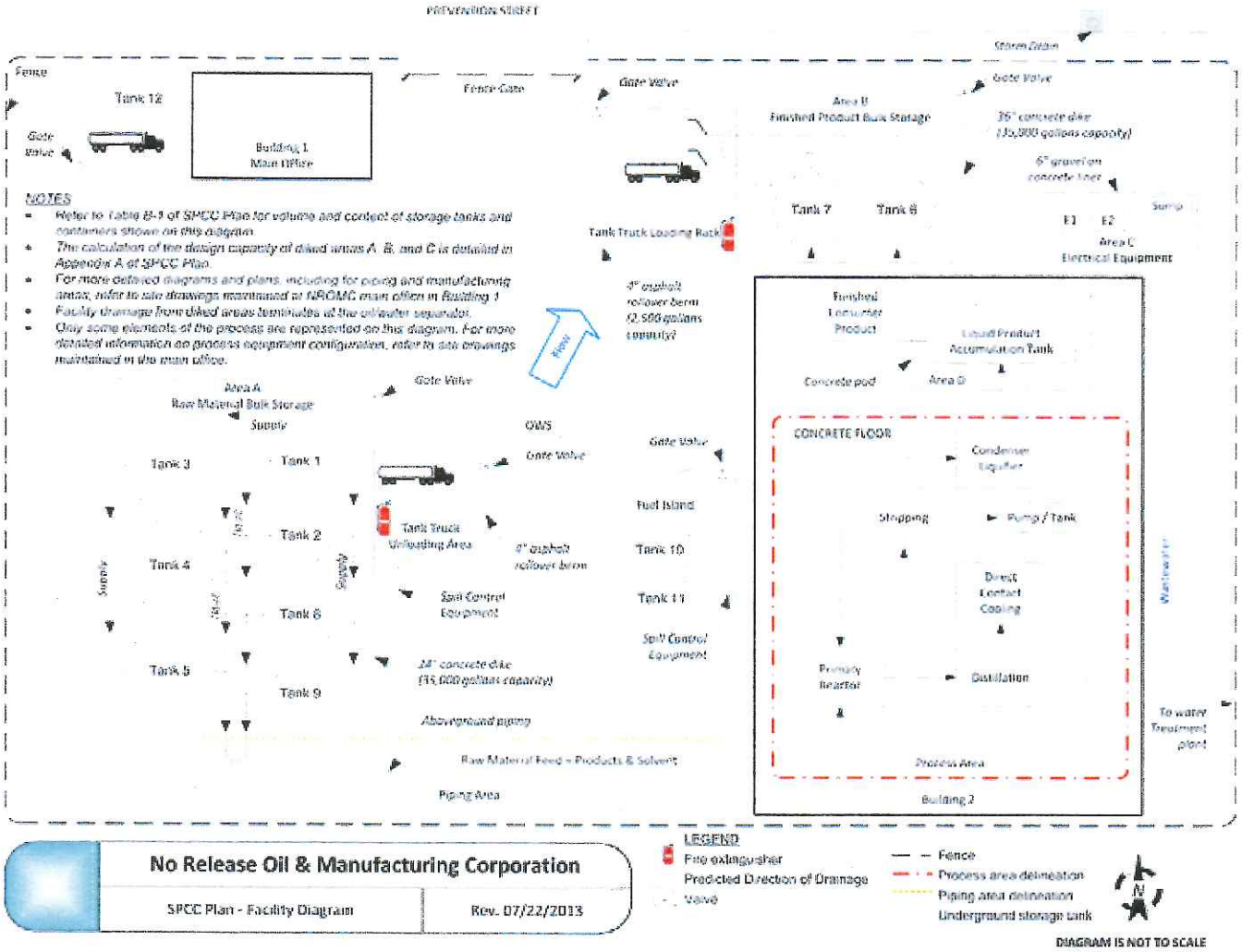

Table B-3: Volume and contents of containers identified on the facility diagram.

Tank/Container	Volume (gallons)	Contents
Area A – Raw Material Bulk Storage		
Tank 1	4,000	Product A – #2 fuel oil
Tank 2	4,000	Product A – #2 fuel oil
Tank 3	20,000	Product B – #6 fuel oil
Tank 4	20,000	Product B – #6 fuel oil
Tank 5	20,000	Product B – #6 fuel oil
Tank 8	6,000	Product C – Kerosene
Tank 9	4,000	Solvent – Toluene
Area B – Finished Product Bulk Storage		
Tank 6	20,000	Product D – proprietary oil
Tank 7	20,000	Product D – proprietary oil
Area C – Electrical Equipment		
Transformer E1	235	Silicon-based dielectric fluid
Transformer E2	235	Silicon-based dielectric fluid
Area D		
Liquid Product Accumulation Tank	10,000	Product D – proprietary oil
Process Area		
Primary Reactor	500	intermediate oil product
Distillation	500	intermediate oil product
Direct Contact Cooling	500	intermediate oil product
Stripping	500	intermediate oil product
Pump/Tank	300	intermediate oil product
Condenser Liquefier	500	intermediate oil product
Underground Storage Tanks		
Tank 10 (otherwise exempt from SPCC requirements)	8,000	gasoline
Tank 11 (otherwise exempt from SPCC requirements)	8,000	gasoline
Tank 12	2,000	heating oil

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6.5.3 Example #3: Oil Production Facility

Figure 6-5 illustrates a small oil production facility with two extraction wells and a production tank battery. As required by §112.7(a)(3), this diagram includes all containers with a storage capacity of 55 gallons or

greater and transfer areas. Because the facility has a relatively large footprint, the direction of flow is best displayed on a separate figure that shows the general location of the site relative to receiving water bodies ().

Figure 6-5: Example facility diagram for an oil production facility.

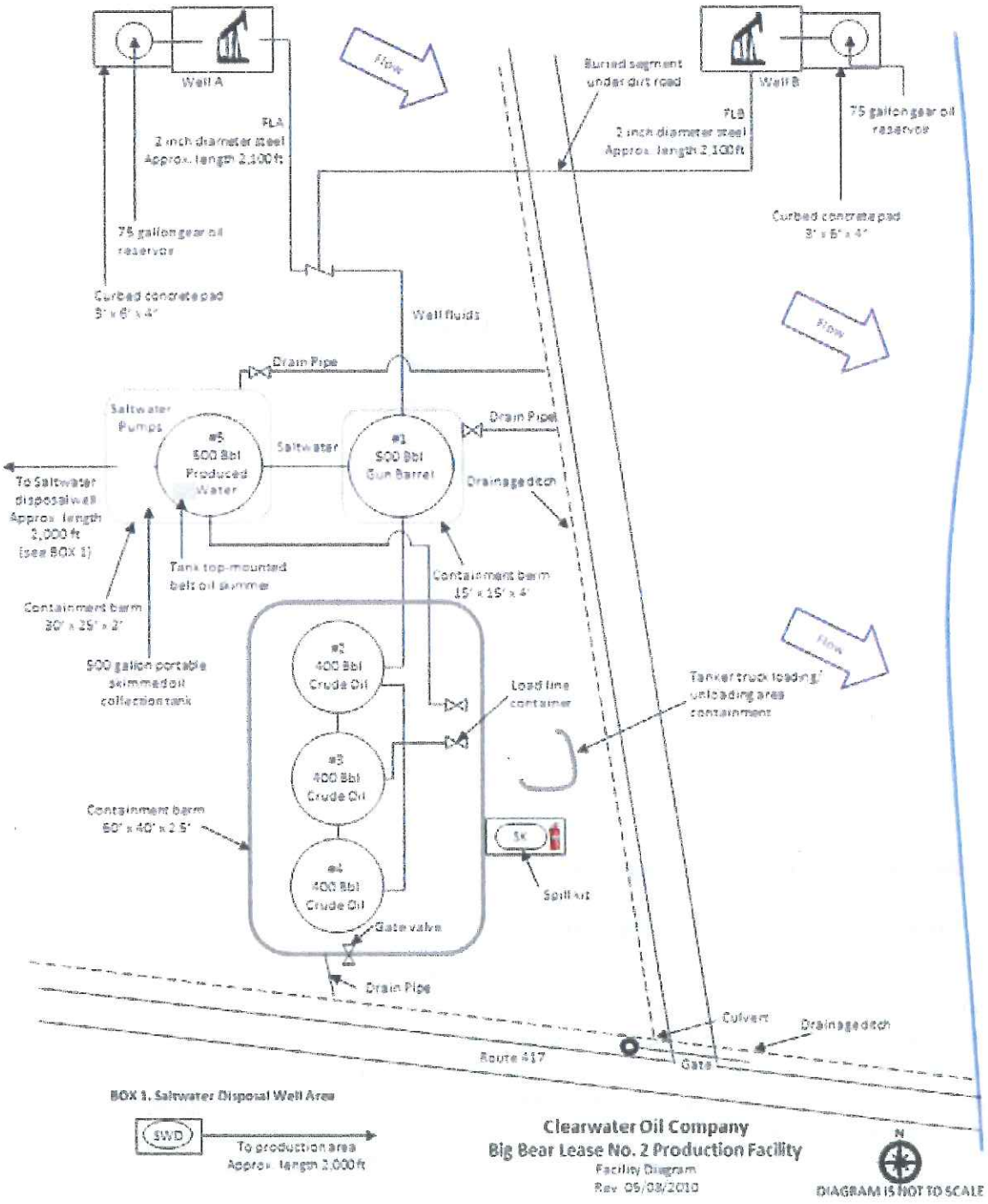
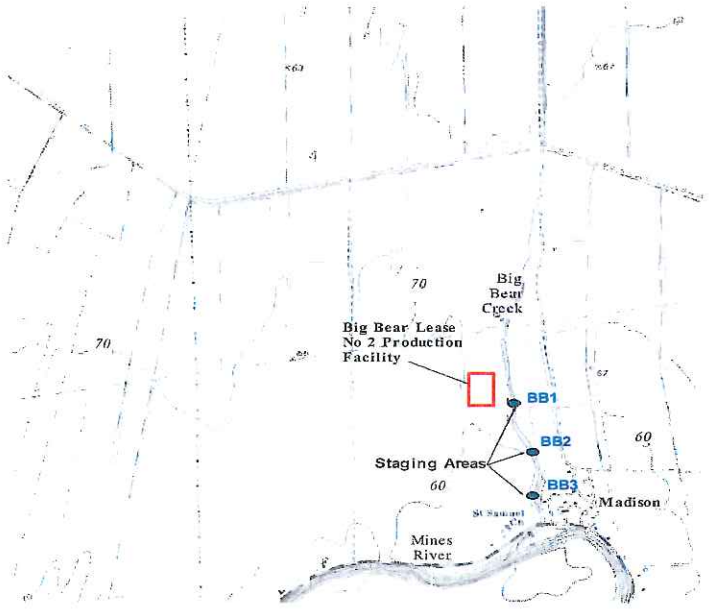


Figure 6-6: Example general facility location diagram for an oil production facility.



6.6 Review of a Facility Diagram

6.6.1 Documentation by Owner/Operator

The person certifying the SPCC Plan attests familiarity with the requirements of 40 CFR part 112; that the Plan has been prepared in accordance with good engineering practice (or for a Tier II qualified facility, in accordance with accepted and sound industry practices and standards); follows the requirements of 40 CFR part 112; and that the Plan is adequate for the facility. Thus, if an SPCC Plan is certified, and the facility diagram is consistent with the rule requirements, it will most likely be considered acceptable by regional EPA inspectors. However, if the facility design has changed and is no longer accurately represented on the diagram, the supporting drawings for a simplified diagram are not available at the facility, or the diagram appears to be

inadequate for the facility, appropriate follow-up action may be warranted. This action may include a request for more information or a Plan amendment in accordance with §112.4(d).

Additionally, changes to the facility diagram are considered administrative in nature and do not require PE certification. (72 FR 58389, October 15, 2007) The same is true for a Tier II qualified facility: the owner or operator does not need to certify changes to a facility diagram in accordance with §112.6(b)(2) because these changes are not considered technical amendments.

6.6.2 Role of the EPA Inspector

As part of the EPA inspection, the inspector will verify that the diagram accurately represents the facility layout and provides sufficient detail as outlined in §112.7(a)(3), and use it as a guide for the containers and piping inspected during the site visit.

The EPA inspector should verify that the diagram included in the Plan includes:

- Location and contents of each fixed container (except those below the *de minimis* container size of 55 gallons as described in *Section 6.4.3*, above).
- Location of storage areas (which may also include operational or staging areas) for mobile or portable containers.
- Completely buried tanks, including those that are otherwise exempt from the SPCC rule by §112.1(d)(4).
- All transfer stations (i.e., areas where oil is transferred) and connecting pipes including intra-facility gathering lines that are otherwise exempt from the SPCC rule by §112.1(d)(11).

Although EPA stated in both the preamble of the 2002 SPCC rule (67 FR 47097, July 17, 2002) and in §112.7(a)(3) that all facility transfer stations and connecting pipes that handle oil must be included in the diagram, the rule allows flexibility on the method of depicting concentrated areas of piping and oil-filled manufacturing equipment on the facility diagram. These areas may be represented in a more simplified manner, as long as more detailed diagrams (such as blueprints, engineering diagrams, or process charts) are available at the facility and referenced in the SPCC Plan. The EPA inspector may ask to review more detailed diagrams of piping and oil-filled manufacturing equipment if further information is needed during a site inspection

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Ref ID	CONTENTS	CAPACITY (gal)	Col ID	Col #	CONSTRUCTION MATERIAL	CONTAINMENT TYPE
CONT-AMS-TK01	Diesel Fuel	300	L	137	Steel	Catch basin
CONT-AMS-TK02	Diesel Fuel	300	L	137	Steel	Catch basin
CONT-KM-TK03	Diesel Fuel	350	L	137	Steel	Catch basin
CONT-KM-TK04	Diesel Fuel	350	L	137	Steel	Catch basin
CONT-ST-TK05	Diesel Fuel	350	0	0	Steel	Catch basin
TRANS-SA01	Mobilgard 450	55	M	139	LDPE Plastic	Building
TRANS-TK01	Citgo RD-943 (SAE 40)	250	M	139	Steel	Building
TRANS-TK02	Antifreeze 50/50 mix	288	M	139	Welded steel	Building
TRANS-TK03	Citgard 600 Motor Oil, SAE 15W-40	288	M	139	Steel	Building
TRANS-TK04	Citgo A/W Hydraulic Oil 32	288	M	139	Welded steel	Building
TRANS-TK05	Citgo Transgard Multi-Purpose ATF	288	M	139	Welded steel	Building
TRANS-TK06	Diesel	500	L	139	Welded steel	Catch basin
TRANS-TK08	Unleaded Gasolines, All Grades	1000	L	139	Welded steel	Concrete dike
TRANS-TK09	Biodiesel	1200	L	139	Steel	Concrete dike
TRANS-TK11	Used Oil	350	M	139	Plastic	Concrete dike
TS-SA01	Oil Storage area	55	H	89	Steel	Pan
TS-SA02	Storage Area	55	H	89	Steel	Pan
TS-TK01	Citgo A/W Hydraulic Oil 60	300	H	89	Steel	Catch basin
AC-SA01	Supercompressor Fluid 68		D	61		Building
AC-TK01	Supercompressor Fluid 68	250	D	65	Welded steel	Basement
AC-TK02	Supercompressor Fluid 68	375	D	65	Plastic	Catch basin
CM-SA01	Gear Oil	250	H	111	Steel	Catch basin
CM-SA02	Extra HECLA Gear Oil Super 680	250	H	117	Steel	Catch basin
CM-SA03	KEROSENE	250	H	121	Steel	Pit/tray
FP-TK01	Diesel Fuel No. 2, Low Sulfur & Low Sulfur Red	185	K	85	Welded steel	Catch basin
FP-TK02	Diesel Fuel No. 2, Low Sulfur & Low Sulfur Red	185	K	85	Steel	Catch basin
PWWT-SA02	OIL STORAGE	55	K	139	Steel	Building
ULPH-SA01	Storage Area	55	0	0	Steel	Catch basin
GAL3-LD01	Various	5000	O	8	Steel	Building/mill floor
GAL3-SA01	OIL STORAGE	55	O	11	Cast steel	Concrete walls

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Ref ID	CONTENTS	CAPACITY (gal)	Col ID	Col #	CONSTRUCTION MATERIAL	CONTAINMENT TYPE
GAL3-SA02	OIL STORAGE	55	N	7	Welded steel	Catch basin
GAL3-TK09	Ferrocote 61A US	5000	O	11	Welded steel	Built-in Rectangular dike
GAL3-TK10	Rustilo DW 924 HF	5000	O	11	Cast steel	Built-in Rectangular dike
GAL3-TK21	EP Compound 220	600	N	7	Welded steel	Curbed steel pan
GAL3-TK22	Citgo A/W 46	600	N	7	Steel	Catch basin
48GL-TK06	Out-of Service	600	G	113	Welded steel	Building
48GL-TK07	Out-of-Service	600	G	113	Steel	Mill floor/Building
48GL-TK08	Out-of-Service	600	F	29	Steel	Pan
GACT-LD01	VARIETY OF OILS	5000	E	27	Steel	Pit/tray
GACT-SA03	OIL STORAGE	55	E	27	Steel	Catch basin
GACT-SA08	OIL STORAGE	300	F	5	Steel	Building
GACT-SA10	OIL STORAGE	55	E	19	Plastic	Building
GACT-SA11	Used Oil	330	F	37	Plastic	Catch basin
GACT-SA12	Storage Area		F	37		Building
GACT-TK01	Citgo Hydraulic Oil AW 68	440	E	61	Welded steel	Catch basin
GACT-TK02	Citgo Hydraulic Oil AW 68	440	E	61	Welded steel	Catch basin
GACT-TK03	Citgo Hydraulic Oil AW 68	450	E	23	Welded steel	Catch basin
GACT-TK04	Citgo A/W 46 oil	500	D	35	Welded steel	Building
GACT-TK07	Vanishing Oil (Rustilo DW 924HF)	750	E	27	Steel	Concrete dike
GACT-TK08	Montgomery PL 7105-A (RED)	345	E	27	Steel	Berm
GACT-TK09	FERROCOTE 61 MALHCL1	400	E	27	Welded steel	Catch basin
GACT-TK10	COATING OIL (Ferrocote 61 AUS)	1100	E	27	Steel	Berm
GACT-TK11	COATING OIL (Ferrocote 61 AUS)	1100	E	27	Welded steel	Catch basin
GACT-TK13	VULSOL MW SOLVENT CLEANER	330	F	35	Welded steel	Catch basin
GACT-TK35	COATING Oil	6,000	E	27		Building
CRS5-LD01	Transfer Area	5000	K	69	Steel	Mill floor/Building
CRS5-SA03	Various Oils		H	77		Building
CRS5-TK14A	ROLLKLEEN Dp-2081 MW	8000	K	77	Welded steel	Catch basin
CRS5-TK14B	ROLLKLEEN Dp-2081MW	8000	K	77	Welded steel	Catch basin
CRS5-TK19	Mobillube HD 85W-140	950	K	69	Welded steel	Building/Basement

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Ref ID	CONTENTS	CAPACITY (gal)	Col ID	Col #	CONSTRUCTION MATERIAL	CONTAINMENT TYPE
CRS5-TK21	Tempershield 57LO	500	K	69	Plastic	Building/Basement
CRS5-TK22	Citgo A/W 32	350	K	69	Steel	Catch basin
CRS5-TK23A	Mobil DTE Oil Light	500	I	69	Welded steel	Building
CRS5-TK23B	Mobil DTE Oil Light	500	I	69	Welded steel	Building
CRS5-TK24	Hydrashield		K	69		Building
RCCM-SA01	Oil Storage area	330	L	47	Welded steel	Catch basin
RCCM-SA04	EP Compound 150	55	L	37	Welded steel	Catch basin
RCCM-SA05	Castrol Rustilo DW 924 HF	350	L	31	Welded steel	Catch basin
RCCM-TK01	Vulsol MW Solvent Cleaner	530	L	37	Welded steel	Building/Basement
RCCM-TK02	Vulsol MW Solvent Cleaner	549	L	37	Welded steel	Building/Basement
RCCM-TK03	Citgo A/W 68	1496	L	37	Welded steel	Building
RCCM-TK04	Citgo A/W 68	1400	L	27	Steel	Building
RCCM-TK05A	Ferrocote 61 MAL HCL 1	2393	L	31	Welded steel	Basement
RCCM-TK05B	Rustilo DW 924 HF	2393	L	31	Steel	Building/mill floor
RCCM-TK05C	Montgomery RP-4107-AV	2393	L	31	Steel	Building/mill floor
RCCM-TK06A	Ferrocote 61A US	4862	L	31	Welded steel	Building/mill floor
RCCM-TK06B	DOS Oil	1000	L	31	Welded steel	Building/mill floor
RCCM-TK06C	NOX-Rust X-111	1500	L	31	Steel	Building/mill floor
GACT-TK06	Hydraulic Oil AW 68	500	G	133	Welded steel	Catch basin
PKLM-LD01	Transfer area	5000	M	73	Steel	Catch basin
PKLM-LD02	Mobil DTE 24	3000	M	103	Steel	Building
PKLM-LD04	Mobil Hydraulic oil AW 68	3000	L	115	Steel	Building
PKLM-SA04	Drum & Tote storage area	55	N	99	Steel	Catch basin
PKLM-SA08	Grease drums & cart storage area	55	L	85	Steel	Catch basin
PKLM-SA09	Oil Storage area	55	L	73	Steel	Catch basin
PKLM-SA11	Grease		L	73		Building
PKLM-SA12	KEROSENE		P	103		Building
PKLM-SA13			M	80		Building
PKLM-TK14, TK15, TK29, TK30	MOBIL AW68	1600	N	109	Welded steel	Catch basin
PKLM-TK20	Citgo A/W 68 oil	900	M	71	Welded steel	Basement

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Ref ID	CONTENTS	CAPACITY (gal)	Col ID	Col #	CONSTRUCTION MATERIAL	CONTAINMENT TYPE
PKLM-TK21	Citgo A/W 68 oil	900	M	71	Welded steel	Basement
PKLM-TK27	COATING OIL	16000	M	71	Steel	Basement
PKLM-TK31	Mobil Hydraulic Oil AW 68	450	M	111	Steel	Building
PKLM-TK32	Citgo A/W hydraulic Oil 32	350	M	105	Welded steel	Catch basin
TMSM-LD01	Transfer station for filling TMSM-TK12	5000	L	49	Steel	Concrete dike
TMSM-LD02	Transfer station for filling indoor tanks	5000	K	53	Steel	Building
TMSM-SA01	Oil Storage area	55	J1	49	Steel	Pan
TMSM-SA02	Drum Storage area	55	K	47	Steel	Building
TMSM-SA03	Drum Storage Area	55	L	43	Steel	Building
TMSM-TK03	Citgo A/W 32	1200	J1	49	Welded steel	Building/Basement
TMSM-TK04	Tempershield 97-MW	1800	J1	49	Welded steel	Catch basin
TMSM-TK05	Vulcan CRPS-90MW Pickle Oil	1000	J1	47	Welded steel	Basement
TMSM-TK07	Hydrashield MW	960	J1	47	Welded steel	Building/Basement
TMSM-TK08	Ferrocote 61 MALHCl1	1800	J1	47	Welded steel	Concrete dike
TMSM-TK09	Ferrocote 61A US	2400	K	45	Welded steel	Catch basin
TMSM-TK10	Ferrocote 61A US	2000	K	45	Welded steel	Building
TMSM-TK11	Ferrocote 61 MALHCl1	500	K	45	Welded steel	Catch basin
TMSM-TK12	Tempershield 97-MW	4000	L	47	Welded steel	Building
TMSM-TK13	Mobil Hydraulic Oil AW 68	960	H	45	Welded steel	Building
RS-SA01	Tote & Drum Storage area	55	F	73	Steel	Building
RS-SA02	Tote Storage area	350	F	79	Welded steel	Building
RS-SA03	Used Oil		F	87		Building
RS-SA05	CP-30G	55	G	93	Steel	Building
RS-TK02	Rollgrind 101M Coolant	3000	F	79	Plastic	Building
RS-TK04	Citgo Hydraulic oil 32	500	F	79	Welded steel	Building
RS-TK05	SlideRite 220	350	F	87	LDPE Plastic	Building
RS-TK06	Lubricating Oil	500	F	87		Building
TFG-SA01	Mobilith AW-2	55	E	113	Steel	Building
CRT5-LD01	VARIETY OF OILS	55	K	85	Steel	Concrete dike
CRT5-SA03	OIL STORAGE	500	L	85	Steel	Catch basin

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Ref ID	CONTENTS	CAPACITY (gal)	Col ID	Col #	CONSTRUCTION MATERIAL	CONTAINMENT TYPE
CRT5-TK10	Rollshield 316M	10000	K	83	Welded steel	Basement
CRT5-TK15A	Hydrashield MW	470	K	81	Welded steel	Catch basin
CRT5-TK15B	Hydrashield MW	470	K	81	Welded steel	Catch basin
CP-TK02	Mobil Hydraulic Oil AW 68	230	E	85	Welded steel	Building
ETCM-SA05	OIL STORAGE	55	E	95	Steel	Building
ETCM-SA09	OIL STORAGE	55	D	93	Steel	Building
ETCM-TK02	Citgo A/W 68 oil	600	E	105	Welded steel	Portable containment; Building/mill floor
ETCM-TK05	Citgo A/W 68 oil	600	E	91	Welded steel	Drip pan; Basement/mill floor
ETCM-TK22	USED OIL	330	E	95	Plastic	Basement
CLNM-TK01	Citgo Hydraulic Oil AW 68	500	G	81	Welded steel	Catch basin
CLNM-TK03	Citgo Hydraulic oil AW 68	500	G	73	Welded steel	Catch basin
CLNM-TK04	EP Compound 320	500	G	69	Welded steel	Catch basin
CLNM-TK05	300 CITGO A/W HYDRAULIC OIL	500	G	69	Welded steel	Catch basin
ANCA-SA03	OIL STORAGE	55	G	119	Steel	Building
ANCA-TK04	Citgo A/W 68	500	G	119	Steel	Building
DCRM-SA01	Drum & Tote Storage area	55	F	131	Steel	Building
DCRM-SA05	VARIOUS OILS	600	G	123	Steel	Building/mill floor
DCRM-TK09A, TK09B, TK09C	Hydroshield	330	F	125	Stainless steel	Portable Containment/Building/Mill Floor
DCRM-TK10	Solvo Clean TLS	500	F	125	Steel	Catch basin
DCRM-TK11A, TK11B	KS 8-2000B	500	F	129	Welded steel	Pit/tray
DCRM-TK13	Citgo EP compound 320	450	G	125	Steel	Building/Basement
RCL1-TK01	Citgo Hydraulic Oil AW 68	600	F	125	Welded steel	Building
RCL2-SA02	Drum & Tote Storage area	500	E	132	Welded steel	Portable Containment/Building/Mill Floor
RCL2-SA03	Drum Storage area	55	E	127	Steel	Building
RCL2-TK01	Citgo a/w 68	450	E	129	Steel	Building
ETLM-SA02	OIL STORAGE	55	F	87	Welded steel	Building
ETLM-TK01	Citgo Hydraulic Oil A/W 68	600	F	113	Welded steel	Building/mill floor
ETLM-TK02	Citgo HYDRAULIC OIL AW 68	500	F	113	Steel	Catch basin
ETLM-TK09	VACTRA OIL AW 68	500	F	87	Welded steel	Building

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Ref ID	CONTENTS	CAPACITY (gal)	Col ID	Col #	CONSTRUCTION MATERIAL	CONTAINMENT TYPE
ETLM-TK10	Mobil Hydraulic Oil AW 68	600	F	87	Welded steel	Building/mill floor
ETLM-TK11	Mobil Hydraulic oil AW 68	500	F	87	Welded steel	Portable containment
TMTM-SA01	Storage Area		G	137		Building
TMTM-SA02	Various Oils		F	137		Building
TMTM-SA03	Storage Area		G	139		Building
TMTM-TK07A, B, C	Hydrashield MW	550	F	133	Welded steel	Pit/tray
TMTM-TK08	Solvo Clean TLS	330	G	133	Welded steel	Portable Containment/Building/Mill Floor
TMTM-TK09	EP compound 320	450	G	135	Welded steel	Building/mill floor

Midwest Plant SPCC Process Equipment Inventory

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
2 Tin Temper				
TMTM-TK01	East Backup Lube	15000	Indoor	Basement
TMTM-TK02	West Backup Lube	15000	Indoor	Basement
TMTM-TK03	Screwdown Oil System	400	Indoor	Basement
TMTM-TK04	Outboard Support Arm Bearing	250	Indoor	Basement
TMTM-TK05	Hydraulic System Tank	3000	Indoor	Basement
TMTM-TK06	MG Lube Set	400	Indoor	Basement
3CL				
GAL3-GB01	Delivery Looping Tower Gearbox		Indoor	Building
GAL3-GB02	Entry Looping Tower Gearbox		Indoor	Building
GAL3-GB03	#1 Payoff Reel Gearbox		Indoor	Building
GAL3-GB04	#2 Payoff Reel Gearbox		Indoor	Building
GAL3-PS07	Entry End hyraulic system virgin storage	55	Indoor	Building
GAL3-TK01	Entry end Hydraulic system	350	Indoor	Curbing
GAL3-TK02	Entry end Askania	100	Indoor	Curbing
GAL3-TK03	Entry Tower Askania #1 & #2 system	50	Indoor	Building

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
3CL				
GAL3-TK06	#4 Steering roll hydraulic system	35	Indoor	Curbing
GAL3-TK07	Skin Pass Mill Hydraulic system	500	Indoor	Curbing
GAL3-TK08	Delivery Tower Askania #1 & #2 systems	50	Indoor	Building
GAL3-TK11	Delivery end hydraulic system	350	Indoor	Curbing
GAL3-TK12	Delivery end Askania #1 & #2	100	Indoor	Curbing
GAL3-TK14	Strip Oil - Day Tank #2	100	Indoor	Curbing
GAL3-TK15	Vanishing Oil - Day Tank #1	100	Indoor	Curbing
GAL3-TK17	GFG Acrylic Coater hydraulic tank	60	Indoor	Building
GAL3-TK18	GFG Acrylic Coater hydraulic tank	60	Indoor	Building
52" 5 Stand				
CRT5-TK01	Morgoil East	5000	Indoor	Basement
CRT5-TK02	Morgoil West	5000	Indoor	Basement
CRT5-TK03	Morgoil #2 North	16000	Indoor	Basement
CRT5-TK04	Morgoil #2 South	16000	Indoor	Basement
CRT5-TK05	Circulating System 3	4000	Indoor	Basement
CRT5-TK06	Circulating System 4	4000	Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
52" 5 Stand				
CRT5-TK07	Auxillary Hydraulic Tank	2872	Indoor	Basement
CRT5-TK14	Stand 1 Screwdown Hydraulic Tank	1000	Indoor	Basement
72" Galv Line				
GACT-GB01	#1 Payoff Reel		Indoor	Basement
GACT-GB02	#2 Payoff Reel		Indoor	Basement
GACT-GB03	Top Scrap Chopper		Indoor	Basement
GACT-GB04	Bottom Scrap Chopper		Indoor	Basement
GACT-GB05	Bottom Scrap Chopper Pinch Roll		Indoor	Basement
GACT-GB06	Top Scrap Chopper Pinch Roll		Indoor	Basement
GACT-GB07	#1 Payoff Levelor		Indoor	Mill floor/Building
GACT-GB08	#2 Payoff Levelor		Indoor	Mill floor/Building
GACT-GB09	#1 Bridle Entry		Indoor	Building
GACT-GB10	#1 Bridle Exit		Indoor	Basement; Area sump
GACT-GB11			Indoor	Basement
GACT-GB12	#2 Bridle Exit		Indoor	Basement
GACT-GB13	#2 Bridle Entry		Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
72" Galv Line				
GACT-GB14	#3 Bridle Entry		Indoor	Basement
GACT-GB15	#3 Bridle Exit		Indoor	Basement
GACT-GB16	#5 Bridle #2 Roll		Indoor	Building
GACT-GB17	#5 Bridle #1 Roll		Indoor	Building
GACT-GB18	#5 Bridle #3 Roll		Indoor	Building
GACT-GB19	#5 Bridle #4 Roll		Indoor	Building
GACT-GB20	Skin Pass Mill - Bottom		Indoor	Building
GACT-GB21	Skin Pass Mill - Top		Indoor	Building
GACT-GB22	#6 Bridle #1 Roll		Indoor	Building
GACT-GB23	#6 Bridle #2 Roll		Indoor	Building
GACT-GB24	#7 Bridle #2 Roll		Indoor	Building
GACT-GB25	#7 Bridle Hybrid Bridle		Indoor	Building
GACT-GB26	#7 Bridle #3 Roll		Indoor	Building
GACT-GB27	#7 Bridle #4 Roll		Indoor	Building
GACT-GB28	Exit Looping Tower		Indoor	Building
GACT-GB29	#8 Bridle #1 Roll		Indoor	Building

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
72" Galv Line				
GACT-GB30	#8 Bridle #2 Roll		Indoor	Building
GACT-GB31	#8 Bridle #3 Roll		Indoor	Building
GACT-GB32	#8 Bridle #4 Roll		Indoor	Building
GACT-GB33	#1 Tension Reel		Indoor	Building
GACT-GB34	#2 Tension Reel		Indoor	Building
GACT-TK03	Exit Hydraulic Oil storage tank	2500	Indoor	Curbing
GACT-TK05	Skin Pass Operating	600	Indoor	Building
GACT-TK12	Exit Hydraulic Unit	750	Indoor	Curbing
GACT-TK17	Pay Off Reel Operating	750	Indoor	Basement
GACT-TK19	Welder Hydraulic Tank	230	Indoor	Building
GACT-TK20	#3 Steering Roll Hydraulic Operating System	40	Indoor	Basement
GACT-TK21	Tension Reel Askania #1	150	Indoor	Curbing
GACT-TK22	Tension Reel Askania #2	150	Indoor	Curbing
GACT-TK23	Coating Oil System 1	95	Indoor	Curbing
GACT-TK24	Coating Oil System 2	95	Indoor	Curbing
GACT-TK25	Coating Oil System 3	95	Indoor	Curbing

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
72" Galv Line				
GACT-TK26	Coating Oil System 4	95	Indoor	Curbing
80" 5 Stand				
CRS5-GB01	Payoff Reel		Indoor	Basement
CRS5-GB02L	Stand #1 - Lower		Indoor	Basement
CRS5-GB02U	Stand #1 - Upper		Indoor	Basement
CRS5-GB03L	Stand #2 - Lower		Indoor	Basement
CRS5-GB03U	Stand #2 - Upper		Indoor	Basement
CRS5-GB04L	Stand #3 - Lower		Indoor	Basement
CRS5-GB04U	Stand #3 - Upper		Indoor	Basement
CRS5-GB05L	Stand #4 - Lower		Indoor	Basement
CRS5-GB05U	Stand #4 - Upper		Indoor	Basement
CRS5-GB06L	Stand #5 - Lower		Indoor	Basement
CRS5-GB06U	Stand #5 - Upper		Indoor	Basement
CRS5-GB07	Tension Reel		Indoor	Basement
CRS5-TK01	Morgoil System A East	12000	Indoor	Basement
CRS5-TK02	Morgoil System A West	12000	Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
80" 5 Stand				
CRS5-TK03	Morgoil System B East	14000	Indoor	Basement
CRS5-TK04	Morgoil System B West	14000	Indoor	Basement
CRS5-TK05	Circulating Oil System A North	4000	Indoor	Basement
CRS5-TK06	Circulating Oil System A South	4000	Indoor	Basement
CRS5-TK07	Circulating Oil System B North	2500	Indoor	Basement
CRS5-TK08	Circulating Oil System B South		Indoor	Basement
CRS5-TK09	Auxiliary hydraulic system	5000	Indoor	Basement
CRS5-TK10	Roll Balance hydraulic system	800	Indoor	Basement
CRS5-TK11	Stand One Screwdown hydraulic system	1100	Indoor	Basement
CRS5-TK15	Stand 5 Roll Bend system	100	Indoor	Building/Basement
CRS5-TK16	MOT/GEN Lube system	1500	Indoor	Curbing
CRS5-TK23B	Stand 5 Roll Bend Oil Storage	500	Indoor	Mill floor/Building
Cleaner Line				
CLNM-GB01	Payoff Reel West		Indoor	Basement
CLNM-GB02	Payoff Reel East		Indoor	Basement
CLNM-GB03	Bridle Exit Roll		Indoor	Building

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
Cleaner Line				
CLNM-GB04	Bridle Entry Roll		Indoor	Building
CLNM-GB05	Tension Reel		Indoor	Building
CLNM-TK08	Entry Hydraulic System		Indoor	Basement
CLNM-TK09	Exit Hydraulic system	1375	Indoor	Curbing
CLNM-TK10	Downender hydraulic system	130	Indoor	Building
Coil Packaging				
CP-TK01	Hydraulic System	110	Indoor	Building
Combo Line				
RCCM-GB01A	Drag Bridle Gear Box #1	30	Indoor	Building/Basement
RCCM-GB02A	Drag Bridle Gear Box #2	30	Indoor	Building
RCCM-GB03A	Drag Bridle Gear Box #3		Indoor	Building
RCCM-GB04A	Pulling Corner Gear Box		Indoor	Building
RCCM-GB05A	Differential Gearbox 5A		Indoor	Building
RCCM-GB06A	Pulling Pinion Gearbox 6A		Indoor	Building/Basement
RCCM-GB07A	South Corner Gearbox 7A		Indoor	Building/Basement
RCCM-GB08	Main Pinch Roll Gear Box		Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
Combo Line				
RCCM-TK07	Shear Hydraulic System	170	Indoor	Building
RCCM-TK08	Welder Hydraulic Operating Tank	250	Indoor	Building/Basement
RCCM-TK09	Leveler Hydraulic Operating Tank	250	Indoor	Building/Basement
RCCM-TK10	Exit Askania Operations Tank	133	Indoor	Building
RCCM-TK11	Delivery end Hydraulic Operating Tank	945	Indoor	Basement
RCCM-TK12	Delivery End Hydraulic Operating Tank	445	Indoor	Basement
RCCM-TK13	Entry Askania Hydraulic operating tank	500	Indoor	Building/Basement
RCCM-TK14	Entry Hydraulic System Operating Tank	450	Indoor	Basement
Continuous Anneal				
ANCA-GB01	Entry Looping Tower		Indoor	Basement
ANCA-GB02	Exit Looping Tower		Indoor	Basement
ANCA-GB03	#2 Tension Reel		Indoor	Basement
ANCA-GB04	#1 Tension Reel		Indoor	Basement
ANCA-GB05	#1 Bridle #1 Roll		Indoor	Building
ANCA-GB06	#1 Bridle #3 Roll		Indoor	Building/mill floor
ANCA-GB07	#2 Payoff Reel		Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
Continuous Anneal				
ANCA-GB08	#1 Payoff Reel		Indoor	Basement
ANCA-GB09	#1Bridle#3Roll		Indoor	Building
ANCA-TK05	Exit end Askania system	300	Indoor	Curbing
ANCA-TK06	Exit end hydraulic system	300	Indoor	Curbing
ANCA-TK08	Entry end hydraulic system	300	Indoor	Basement
DCR Mill				
DCRM-GB01	Stand 1		Indoor	Basement
DCRM-GB02	Stand 2		Indoor	Basement
DCRM-GB03	Payoff Reel		Indoor	Basement
DCRM-GB04	Tension Reel		Indoor	Basement
DCRM-TK01	West Rolling Oil Solution Tank	5000	Indoor	Basement
DCRM-TK02	East Rolling Oil Solution Tank	5000	Indoor	Basement
DCRM-TK03A	Hydraulic Tank	800	Indoor	Basement
DCRM-TK03B	Hydraulic Tank	500	Indoor	Basement
DCRM-TK04	East Back Up Lube	12000	Indoor	Basement
DCRM-TK05	West Back Up Lube	12000	Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
DCR Mill				
DCRM-TK06	Main screwdown	300	Indoor	Basement
DCRM-TK07	Main drive lube	1000	Indoor	Basement
DCRM-TK08	MG lube set	50	Indoor	Basement
Pickle Line				
PKLM-TK01	Entry Hydraulic System	1036	Indoor	Building/Basement
PKLM-TK02	Mandrel #1 Hydraulic system	450	Indoor	Building/Basement
PKLM-TK03	Mandrel #2 Hydraulic system	450	Indoor	Building/Basement
PKLM-TK04	Welder hydraulic system	600	Indoor	Building/Basement
PKLM-TK11	Steering Hydraulic system	200	Indoor	Building/Basement
PKLM-TK12	Temper Mill Hydraulic system	200	Indoor	Basement
PKLM-TK13	Temper Mill Gear Box Lube system	400	Indoor	Basement
PKLM-TK15	Entry Hydraulic Storage Tank #2	500	Indoor	Building
PKLM-TK16	Delivery End Hydraulic system	880	Indoor	Basement
PKLM-TK29	Entry Hydraulic Storage Tank #3	500	Indoor	Building
Recoil #1				
RCL1-GB01	Scrap Bailer		Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
Recoil #1				
RCL1-GB02	North Payoff reel		Indoor	Building
RCL1-GB03	Tension Reel		Indoor	Basement
RCL1-TK02	Hydraulic System	350	Indoor	Curbing
RCL1-TK03	Askania System	350	Indoor	Curbing
Recoil #2				
RCL2-GB01	North Payoff Reel		Indoor	Basement
RCL2-GB02	Tension Reel		Indoor	Basement
RCL2-TK02	Side Trimmer Lube system	125	Indoor	Basement
RCL2-TK03	Askania	100	Indoor	Building
RCL2-TK04	Hydraulic System #1	600	Indoor	Basement
Sheet Temper Mill				
TMSM-TK12	Wet Roll Solution Storage Tank	4000	Indoor	Building
TMSM-TK14	Storage Tank for Roll Balance	1200	Indoor	Basement
TMSM-TK15	Coating Oil Tank	5000	Indoor	Basement
TMSM-TK16A	Circulating System - north	1200	Indoor	Basement
TMSM-TK16B	Circulating System - south	1200	Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
Sheet Temper Mill				
TMSM-TK17	Solution Tank	250	Indoor	Basement
TMSM-TK18A	Morgoil System- North	4000	Indoor	Basement
TMSM-TK18B	Morgoil System- South	4000	Indoor	Basement
TMSM-TK19	Wedge Drive Operating Tank	150	Indoor	Basement
TMSM-TK20	Cradle Car Hydraulic Operating Tank	960	Indoor	Basement
TMSM-TK21	Roll Bend Operating Tank	240	Indoor	Building
TMSM-TK22	Roll Balance Operating Tank	450	Indoor	Basement
Tin Free Steel				
ETCM-GB01	Entry Looping Tower		Indoor	Basement
ETCM-GB02	#1 Payoff Reel		Indoor	Building
ETCM-GB03	#2 Payoff Reel		Indoor	Building
ETCM-GB04	#1 Tension Reel		Indoor	Basement
ETCM-GB05	#2 Tension Reel		Indoor	Basement
ETCM-TK07	#2 Steering Roll West	35	Indoor	Drip Pan; Basement
ETCM-TK08	#2 Steering Roll East Tank	35	Indoor	Drip pan; Basement
ETCM-TK09	Entry Hydraulic System	500	Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
Tin Free Steel				
ETCM-TK15	Exit Hydraulic System	500	Indoor	Basement
ETCM-TK17	#1 Askania		Indoor	Basement
ETCM-TK18	#2 Askania		Indoor	Basement
ETCM-TK19	#3 Steering Roll Hydraulic System		Indoor	Building
ETCM-TK20	#1 Entry Edge Control		Indoor	Building
ETCM-TK21	#2 Entry Edge Control		Indoor	Basement
ETCM-TK38	#1 Steering Hydraulic System		Indoor	Building
Tin Line				
ETLM-GB01	Entry Looping Tower		Indoor	Basement
ETLM-GB02	Tension Reel #1		Indoor	Basement
ETLM-GB03	Tension Reel #2		Indoor	Basement
ETLM-GB04	#1 Payoff reel		Indoor	Building
ETLM-GB05	#2 Payoff Reel		Indoor	Building
ETLM-GB06	Exit Looping Tower		Indoor	Basement
ETLM-TK12	Entry Askania	200	Indoor	Basement
ETLM-TK13	Entry Hydraulic System	400	Indoor	Basement

Ref ID	Process Equipment	*CAPACITY: gallons*	Indoor Outdoor	Containment
Tin Line				
ETLM-TK17	Exit Askania	200	Indoor	Basement
ETLM-TK18	Exit Hydraulic system	400	Indoor	Basement

Midwest Plant SPCC Transformer Inventory

Ref ID	Transformer	*CAPACITY gallons*	Indoor Outdoor	Containment
1001	TXFR-1001	950	INDOOR	Building
1002	TXFR-1002	700	INDOOR	Building
1061	TXFR-1061	950	INDOOR	Building
1062	TXFR-1062	950	INDOOR	Building
1063	TXFR-1063	950	INDOOR	Building
1064	TXFR-1064	1030	INDOOR	Building
1065	TXFR-1065	1065	INDOOR	Building
1066	TXFR-1066	700	INDOOR	Building
1067	TXFR-1067	500	INDOOR	Building
1A	TXFR-1A	4940	OUTDOOR	Concrete pad with curb
1B	TXFR-1B	4940	OUTDOOR	Concrete pad with curb
2A	TXFR-2A	5114	OUTDOOR	Concrete pad with curb
2B	TXFR-2B	5114	OUTDOOR	Concrete pad with curb
610	TXFR-610	120	INDOOR	Building

Ref ID	Transformer	*CAPACITY gallons*	Indoor Outdoor	Containment
611	TXFR-611	120	INDOOR	Building
630	TXFR-630	450	INDOOR	Building
646	TXFR-646		INDOOR	Building
647	TXFR-647		OUTDOOR	Concrete pad
648	TXFR-648		OUTDOOR	Pole Mounted Transformer
650	TXFR-650		INDOOR	Building
694	TXFR-694		OUTDOOR	Pole Mounted Transformer
701	TXFR-701	1854	INDOOR	Building
702	TXFR-702	800	INDOOR	Building
703	TXFR-703	800	INDOOR	Building
704	TXFR-704	421	INDOOR	Building
705	TXFR-705		INDOOR	Building
706	TXFR-706	165	INDOOR	Building
710	TXFR-710	360	INDOOR	Building
711	TXFR-711	619	INDOOR	Building
712	TXFR-712	482	INDOOR	Building

Ref ID	Transformer	*CAPACITY gallons*	Indoor Outdoor	Containment
713	TXFR-713	360	INDOOR	Building
714	TXFR-714	360	INDOOR	Building
715	TXFR-715	478	INDOOR	Building
716	TXFR-716	280	INDOOR	Building
717	TXFR-717		INDOOR	Building
718	TXFR-718		INDOOR	Building
719	TXFR-719		INDOOR	Building
720	TXFR-720	453	INDOOR	Building
730	TXFR-730	478	INDOOR	Building
731	TXFR-731	460	INDOOR	Building
732	TXFR-732	450	INDOOR	Building
733	TXFR-733	235	INDOOR	Building
734	TXFR-734	280	INDOOR	Building
735	TXFR-735	357	INDOOR	Building
736	TXFR-736	250	INDOOR	Building
738	TXFR-738	238	INDOOR	Building

Ref ID	Transformer	*CAPACITY gallons*	Indoor Outdoor	Containment
740	TXFR-740	421	INDOOR	Building
745	TXFR-745	360	INDOOR	Building
746	TXFR-746	360	INDOOR	Building
801	TXFR-801	421	INDOOR	Building
802	TXFR-802	180	INDOOR	Building
803	TXFR-803	790	INDOOR	Building
804	TXFR-804	460	INDOOR	Building
805	TXFR-805	460	INDOOR	Building
806	TXFR-806	275	INDOOR	Building
807	TXFR-807	275	INDOOR	Building
808	TXFR-808	200	INDOOR	Building
810	TXFR-810	1870	INDOOR	Building
811	TXFR-811	790	INDOOR	Building
812	TXFR-812	404	INDOOR	Building
813	TXFR-813	404	INDOOR	Building
814	TXFR-814	315	INDOOR	Building

Ref ID	Transformer	*CAPACITY gallons*	Indoor Outdoor	Containment
815	TXFR-815	315	INDOOR	Building
816	TXFR-816	530	INDOOR	Building
817	TXFR-817	530	INDOOR	Building
818	TXFR-818	530	INDOOR	Building
819	TXFR-819	530	INDOOR	Building
820	TXFR-820	208	INDOOR	Building
825	TXFR-825		INDOOR	Building
826	TXFR-826		INDOOR	Building
827	TXFR-827	267	INDOOR	Building
828	TXFR-828	267	INDOOR	Building
829	TXFR-829	255	INDOOR	Building
830	TXFR-830	225	INDOOR	Building
831	TXFR-831		INDOOR	Building
845	TXFR-845	357	INDOOR	Building
846	TXFR-846	262	INDOOR	Building
850	TXFR-850		INDOOR	Building

Ref ID	Transformer	*CAPACITY gallons*	Indoor Outdoor	Containment
851	TXFR-851	425	INDOOR	Building
852	TXFR-852	425	INDOOR	Building
853	TXFR-853	425	INDOOR	Building
854	TXFR-854	530	INDOOR	Building
855	TXFR-855	250	INDOOR	Building
901	TXFR-901	180	INDOOR	Building
903	TXFR-903	180	INDOOR	Building
904	TXFR-904	180	INDOOR	Building
905	TXFR-905	180	INDOOR	Building
906	TXFR-906	180	INDOOR	Building
907	TXFR-907	180	INDOOR	Building
908	TXFR-908	180	INDOOR	Building
909	TXFR-909	180	INDOOR	Building
910	TXFR-910	180	INDOOR	Building
913	TXFR-913	200	INDOOR	Building
914	TXFR-914	415	OUTDOOR	Concrete pad

Ref ID	Transformer	*CAPACITY gallons*	Indoor Outdoor	Containment
915	TXFR-915	415	OUTDOOR	Concrete pad
916	TXFR-916	415	OUTDOOR	Concrete pad
929	TXFR-929		INDOOR	Building
930	TXFR-930		INDOOR	Building
931	TXFR-931	451	INDOOR	Building
932	TXFR-932	449	INDOOR	Building

APPENDIX B-2

SWPPP INVENTORIES

Potential SW Pollution Sources

Risk Assessment and Controls

OUTFALL 002
DRAINAGE AREAS

Outfall 002 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Various within the drainage area	1,2,3	All 002 drainage areas	N/A	N/A	Outfall 002	Foam from various sources	Direct to Outfall	None, treatment of outfall with antifoam as needed, see 70100036EMP.	Procedure 70100036EMP Storm Water Chemical at Midwest; routine visual observations during storm events by Test America.	Low	None
Loading/ unloading	2	GAL3-LD01	Sheet	3CL	O-8	Hydraulic oil	Leak/spill; Transfer operation	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	2	GAL3-SA01	Sheet	3CL	O-11	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Concrete walls	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	2	GAL3-SA02	Sheet	3CL	N-7	Lubrication	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GAL3-TK09	Sheet	3CL	O-11	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Built-in Rectangular dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GAL3-TK10	Sheet	3CL	O-11	Hydraulic oil	Leak/spill;Valve(s);Transfer operation;Overfill	Built-in Rectangular dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GAL3-TK21	Sheet	3CL	N-7	Lubrication	Leak/spill;Transfer operation;Overfill	Curbed steel pan	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GAL3-TK22	Sheet	3CL	N-7	Lubrication	Leak/spill;Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	48GL-TK08	Sheet	48" Galv Line	F-29	Hydraulic oil	Transfer operation;Overfill	Pan	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	2	GACT-LD01	Sheet	72" Galv Line	E-27	Hydraulic oil	Transfer operation	Pit/tray	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	2	GACT-SA03	Sheet	72" Galv Line	E-27	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	2	GACT-SA08	Sheet	72" Galv Line	F-5	Cleaning oil	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 002 DRAINAGE AREAS

Outfall 002 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Storage area	2	GACT-SA10	Sheet	72" Galv Line	E-19	Lubrication	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	2	GACT-SA11	Sheet	72" Galv Line	F-37	Used oil	Leak/spill;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK03	Sheet	72" Galv Line	E-23	Hydraulic oil	Leak/spill;Valve(s);Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK04	Sheet	72" Galv Line	D-35	Lubrication	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK06	Sheet	72" Galv Line	G-125 relocated	EP Compound 320	Leak/spill;Valve(s);Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK07	Sheet	72" Galv Line	E-27	Hydraulic oil	Leak/spill;Overfill	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK08	Sheet	72" Galv Line	E-27	Lubrication	Leak/spill;Overfill	Berm	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK09	Sheet	72" Galv Line	E-27	Lubrication	Leak/spill;Valve(s);Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK10	Sheet	72" Galv Line	E-27	Hydraulic oil	Leak/spill;Valve(s);Overfill	Berm	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK11	Sheet	72" Galv Line	E-27	Coating oil	Valve(s);Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK13	Sheet	72" Galv Line	F-35	Solvent Cleaner	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	2	RCCM-SA01	Sheet	Combo Line	L-47	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

Outfall 002 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Storage area		RCCM-SA04	Sheet	Combo Line	L-37	Various Oils	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area		RCCM-SA05	Sheet	Combo Line	L-31	Various Oils	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK01	Sheet	Combo Line	L-37	Cleaning oil	Leak/spill;Transfer operation;Overfill	Building/Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK02	Sheet	Combo Line	L-37	Hydraulic oil	Leak/spill;Transfer operation	Building/Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK03	Sheet	Combo Line	L-37	Hydraulic oil	Manhole;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK04	Sheet	Combo Line	L-27	Hydraulic oil	Leak/spill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK05A	Sheet	Combo Line	L-31	Lubrication	Leak/spill	Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK05B	Sheet	Combo Line	L-31	Hydraulic oil	Leak/spill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK05C	Sheet	Combo Line	L-31	Coating oil	Leak/spill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK06A	Sheet	Combo Line	L-31	Coating oil	Valve(s);Manhole;Transfer operation;Overfill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK06B	Sheet	Combo Line	L-31	Coating oil	Leak/spill;Manhole;Overfill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	RCCM-TK06C	Sheet	Combo Line	L-31	Coating oil	Leak/spill;Manhole;Transfer operation;Overfill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 002 DRAINAGE AREAS

Outfall 002 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Potential spills and leaks from delivery trucks	1	Manhole at Intersection of South and West Roads	MWP	MWP	C-3	oils, fuels, delivered chemicals	leaks/spills have potential to impact 002 storm sewer directly via an open grate manhole on roadway	None feasible	-Quarterly Inspections -Posted warning sign/procedure -Spill Kit near area	Medium	None
Potential spills and leaks from delivery trucks	2	Manholes at South end of south warehouses (3)	MWP	MWP	E5, E/F-5, F5	oils, fuels, delivered chemicals	leaks/spills have potential to impact 002 storm sewer directly via 3 open grate manholes	Jersey barriers	-Quarterly Inspections -Posted warning sign/procedure -Spill Kit near area	Low	None
Potential spills and leaks from employee vehicles	2	AE-1 Employee Parking Lot Manholes	Security/HR	Security/HR	Parking area west side of AE-1	oils, fuels	leaks/spills have potential to impact 002 storm sewer directly via open grate manholes	Jersey barriers	-Quarterly Inspections -Posted warning sign/procedure -Spill Kit near area	Low	None
Loading/ unloading	1	Sodium Bisulfite Loading Station	Op Services	Utilities	B-17	Sodium Bisulfite	Transfer operation, overfill	Building	Spill Kits	Low	None
Packer Box	2	Scale	Security/HR	Security/HR	Scale House	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff	2	3CL, Door 34	Sheet	3CL	P-21	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	3	Track Shack, SW	Op Services	Utilities	W-30	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	2	AE-1 Parking Lot, West	Op Services	Transportation	Q-4	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff	2	Warehouse #54, Door 18	Sheet	CR Shipping STM	L-12	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff	2	Batch Anneal, Door 15	Tin	Batch Anneal	H-12	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	1	Central Receiving	Security/HR	Security/HR	B-23	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	2	72" Parking	Sheet	72" Galv Line	C-29	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	2	3CL, SE	Sheet	3CL	N-3	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard Rolloff	2	3CL, SE	Sheet	3CL	N-3	Metal Scrap	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	1	Walk-in Gate	Security/HR	Security/HR	D-60	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	1	Employee Parking Lot (Main)	Security/HR	Security/HR	B-37	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff (x2)	2	Roll Shop Road	Tin	Roll Shop	G-20	Metal Scrap	Pickup, Overfill	None	Waste Management	Low	None
Loading/ unloading	1	Waste Zinc Phosphate/ ChemTreat	Sheet	72" Galv Line	E-28	Waste Zince Phos/ ChemTreat	Transfer operation	Building, Containment	Spill Kit, Trained personnel	Low	None

Revision Date: 08/10/2015

Outdoor transformers are inspected quarterly under 40 CFR 761 requirements. Refer to PCB Program for details. None pose a direct risk to storm waters.
All storage tanks and transfer areas are inspected quarterly under the 40 CFR 112 requirements. Refer to SPCC Program for details. None pose a direct risk to storm water.

OUTFALL 003
DRAINAGE AREAS

Outfall 003 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Various within the drainage area	1,2,4,5	All 003 drainage areas	N/A	N/A	Outfall 003	Foam from various sources	Direct to Outfall	None, treatment of outfall with antifoam as needed, see 70100036EMP.	Procedure 70100036EMP Storm Water Chemical at Midwest; routine visual observations during storm events by Test America.	Low	None
Storage area	5	TS-SA01	Op Services	Transportation	H-89	Various Oils	Transfer operation	Pan	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TS-SA02	Op Services	Transportation	H-89	Various Oils	Lead/spill; Transfer operation	Pan	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TS-TK01	Op Services	Transportation	H-89	Hydraulic oil	Leak/spill;Valve(s);Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	AC-TK01	Op Services	Utilities	D-65	Hydraulic oil	Transfer operation	Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Negligible (local drainage)	None
Tank	5	AC-TK02	Op Services	Utilities	D-65	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	FTSD-SA01	Op Services	Utilities	Sludge Dewatering	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	4	GACT-TK01	Sheet	72" Galv Line	E-61	Hydraulic oil	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	GACT-TK02	Sheet	72" Galv Line	E-61	Hydraulic oil	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	2	CRS5-LD01	Sheet	80" 5-Stand	K-69	Lubrication	Leak/spill	Mill floor/Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	CRS5-SA03	Sheet	80" 5-Stand	H-77	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRS5-TK14A	Sheet	80" 5-Stand	K-77	Rolling oil	Leak/spill;Valve(s)	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRS5-TK14B	Sheet	80" 5-Stand	K-77	Cleaning oil	Leak/spill;Valve(s);Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRS5-TK19	Sheet	80" 5-Stand	K-69	Lubrication	Leak/spill;Transfer operation;Overfill	Building/Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRS5-TK24	Sheet	80" 5-Stand	K-69	Hydraulic oil	Leak/spill;Valve(s);Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRS5-TK21	Sheet	80" 5-Stand	K-69	Hydraulic oil	Leak/spill; Transfer operation	Building/Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRS5-TK22	Sheet	80" 5-Stand	K-69	Lubrication	Leak/spill;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 003 DRAINAGE AREAS

Outfall 003 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Tank	5	CRS5-TK23A	Sheet	80" 5-Stand	I-69	Hydraulic oil	Leak/spill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRS5-TK23B	Sheet	80" 5-Stand	I-69	Hydraulic oil	Leak/spill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	6	PKLM-LD01	Sheet	Pickle Line	M-73	Coating Oil	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	PKLM-SA04	Sheet	Pickle Line	N-99	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	PKLM-SA08	Sheet	Pickle Line	L-85	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	PKLM-SA09	Sheet	Pickle Line	L-73	Lubrication	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	PKLM-SA11	Sheet	Pickle Line	L-73	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	PKLM-SA13	Sheet	Pickle Line	M-80	Various Oils, Kerosene	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	PKLM-TK20	Sheet	Pickle Line	M-71	Hydraulic oil	Leak/spill;Valve(s);Transfe r operation;Overfill	Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	PKLM-TK21	Sheet	Pickle Line	M-71	Hydraulic oil	Leak/spill;Valve(s);Transfe r operation;Overfill	Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	PKLM-TK27	Sheet	Pickle Line	M-71	Coating oil	Manhole;Transfer operation;Overfill	Basement; Concrete pad diverts into DIW	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	2	TMSM-LD01	Sheet	Sheet Temper Mill	L-49	Hydraulic oil	Transfer operation	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	2	TMSM-LD02	Sheet	Sheet Temper Mill	K-53	Hydraulic oil	Leak/spill;Valve(s);Transfe r operation	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	2	TMSM-SA01	Sheet	Sheet Temper Mill	J-49	Coating oil	Leak/spill; Transfer operation	Pan	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	2	TMSM-SA02	Sheet	Sheet Temper Mill	K-47	Various Oils	Leak/spill; Transfer operation	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	2	TMSM-SA03	Sheet	Sheet Temper Mill	L-43	Used Oil	Leak/spill; Transfer operation	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	TMSM-TK03	Sheet	Sheet Temper Mill	J-49	Hydraulic oil	Transfer operation;Overfill;N/A	Building/Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

Outfall 003 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Tank	2	TMSM-TK04	Sheet	Sheet Temper Mill	J-49	Hydraulic oil	Leak/spill;Valve(s);Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	TMSM-TK05	Sheet	Sheet Temper Mill	J-47	Coating oil	Leak/spill;Valve(s);Transfer operation;Overfill	Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	TMSM-TK07	Sheet	Sheet Temper Mill	J-47	Hydraulic oil	Leak/spill;Valve(s);Transfer operation;Overfill	Building/Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	TMSM-TK08	Sheet	Sheet Temper Mill	J-47	Hydraulic oil	Transfer operation;Overfill	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	TMSM-TK09	Sheet	Sheet Temper Mill	K-45	Rolling oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	TMSM-TK10	Sheet	Sheet Temper Mill	K-45	Coating oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	TMSM-TK11	Sheet	Sheet Temper Mill	K-45	Lubrication	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	TMSM-TK12	Sheet	Sheet Temper Mill	L-47	Hydraulic oil	Valve(s);Manhole;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	2	TMSM-TK13	Sheet	Sheet Temper Mill	H-45	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	5	CRT5-LD01	Tin	52" 5-Stand	K-85	Hydraulic oil	Leak/spill;Transfer operation	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	CRT5-SA03	Tin	52" 5-Stand	L-85	Hydraulic oil	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRT5-TK10	Tin	52" 5-Stand	K-83	Hydraulic oil	Leak/spill;Valve(s);Transfer operation;Overfill	Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRT5-TK15A	Tin	52" 5-Stand	K-81	Hydraulic oil	Leak/spill;Valve(s);Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CRT5-TK15B	Tin	52" 5-Stand	K-81	Hydraulic oil	Leak/spill;Valve(s);Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CP-TK02	Tin	Chrome Line	E-85	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	ETCM-SA05	Tin	Chrome Line	E-95	Various Oils	Transfer operation	Pan	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CLNM-TK01	Tin	Cleaner Line	G-81	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 003 DRAINAGE AREAS

Outfall 003 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Tank	5	CLNM-TK03	Tin	Cleaner Line	G-73	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CLNM-TK04	Tin	Cleaner Line	G-69	Lubrication	Leak/spill;Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CLNM-TK05	Tin	Cleaner Line	G-69	Lubrication	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	RS-SA01	Tin	Roll Shop	F-73	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Building contains	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	RS-SA02	Tin	Roll Shop	F-79	Hydraulic oil	Manhole;Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	RS-SA03	Tin	Roll Shop	F-87	Used Oil	Leak/spill; Transfer operation	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	RS-SA05	Tin	Roll Shop	G-93	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	RS-TK02	Tin	Roll Shop	F-79	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	RS-TK04	Tin	Roll Shop	F-79	Lubrication	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	RS-TK05	Tin	Roll Shop	F-87	Hydraulic oil	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Negligible (in containment)	None
Potential spills and leaks from employee vehicles	4	Employee Parking Lot Manholes	Security/HR	Security/HR	West side Employee parking lot	oils, fuels, delivered chemicals	leaks/spills have potential to impact 003 storm sewer directly via open grate manholes	Jersey barriers around manholes	-Quarterly Inspections -Posted warning sign/procedure -Spill Kit near area	Low	By Apr 30, 2014 post signs in the area
Potential spills and leaks from employee vehicles	1	Security Bldg Area Manholes Along Roadway	Security	Security	West road E. of Security Bldg.	oils, fuels, garage chemicals	leaks/spills and runoff from garage activities have potential to impact 003 storm sewer directly via open grate manholes	None feasible	-Quarterly Inspections -Posted warning sign/procedure prohibiting vehicle washing -Spill Kit near area	Low	None
Barrel Pad	5	Barrel Pad	Op Services	Utilities	K-L 85-90	Oil, Grease, Particulates	Leak/spill; Transfer operation	DIW sewers drain to treatment plant	loading/unloading procedures	Low	None
Storage Area	5	AMROX	Contractor	AMROX	P-75	Particulates, acid	Leak/spill; Transfer operation; Overfill	Fence, Paved Surfaces, Buildings	None	Low	None
Packer Box	4	Contractor Gate	N/A	N/A	B-85	Waste	Pickup, Overfill	None	Waste Management	Low	None
Loading/ unloading zone	4	Employee Parking Lot	N/A	N/A	B-63	Sodium Bisulfite	Transfer Operations	Building, Jersey Barriers	Spill Kits	Low	None
Shavings from Roll Shop grinder	2	Roll Shop Dust Collector, Door 14	Tin	Roll Shop	F-64	Particulates, metal	Pickup, Overfill	Contained in Rolloff	procedures	Low	None
20 yard rolloff	2	Roll Shop, Door 14	Tin	Roll Shop	G-64	Waste	Pickup, Overfill	None	Waste Management	Low	None

Outfall 003 Drainage Areas											
Activity or Source	**MAP Section**	**Source ID/ Common Name**	**Div**	**Dept**	**Location**	**Significant Material(s) /Pollutants**	**Exposure Method/Pathway**	**Structural Controls**	**Non-Structural Controls / BMPs**	**Storm Water Risk Level**	**Planned or Recommended Measures**
20 yard rolloff (1-5)	2	Coil Pad Road	Op Services	Transportation	S-42	Metal Scrap	Pickup, Overfill	Storage of empty rolloffs or unidentified waste	Waste Management	Low	None
Packer Box	2	Material Control, NW	Op Services	Transportation	M-56	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	2	HNX Building, Door 35	Op Services	Transportation	K-53	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff	5	Pickle Line, Door 37	Sheet	Pickle Line	L-64	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff	5	Pickle Line, Door 38	Sheet	Pickle Line	L-64	Metal Scrap	Pickup, Overfill	None	Waste Management	Low	None

Revision Date: 08/10/2015

Outdoor transformers are inspected quarterly under 40 CFR 761 requirements. Refer to PCB Program for details. None pose a direct risk to storm waters.
All storage tanks and transfer areas are inspected quarterly under the 40 CFR 112 requirements. Refer to SPCC Program for details. None pose a direct risk to storm water.

OUTFALL 104 & 004
DRAINAGE AREAS

OUTFALL 104 & 004
DRAINAGE AREAS

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Various within the drainage area	2,3,4,5,6	All 004 drainage areas	N/A	N/A	Outfall 004	Foam from various sources	Direct to Outfall	None, treatment of outfall with antifoam as needed, see 70100036EMP.	Procedure 70100036EMP Storm Water Chemical at Midwest; routine visual observations during storm events by Test America.	Low	None
Tank	5	CONT-AMS-TK01	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CONT-AMS-TK02	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CONT-KM-TK03	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CONT-KM-TK04	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TRANS-SA01	Op Services	Transportation	SE Corner of Transportation Garage	Used oil	Transfer operation	Berm	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK01	Op Services	Transportation	SE Corner of Transportation Garage	Fuel	Leak/spill;Valve(s);Transfer operation	Curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK02	Op Services	Transportation	SE Corner of Transportation Garage	Lubrication	Leak/spill;Transfer operation;Overfill	curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK03	Op Services	Transportation	SE Corner of Transportation Garage	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK04	Op Services	Transportation	SE Corner of Transportation Garage	Hydraulic oil	Leak/spill;Transfer operation	Curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK05	Op Services	Transportation	SE Corner of Transportation Garage	Transmission Fluid	Leak/spill	Curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK06	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK08	Op Services	Transportation	SW of Transportation Garage	Gasoline	Transfer operation;Overfill	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK09	Op Services	Transportation	SW of Transportation Garage	Biodiesel	Leak/spill	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK11	Op Services	Transportation	SW of Transportation Garage	Used oil	Leak/spill;Transfer operation;Overfill	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	CM-SA01	Op Services	Utilities	H-111	Various Oils	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	CM-SA02	Op Services	Utilities	H-117	Various Oils	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 104 and 004 Drainage Areas

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Storage area	5	CM-SA03	Op Services	Utilities	H-121	Various Oils	Leak/spill	Pit/tray	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	FP-TK01	Op Services	Utilities	K-85	Fuel	Leak/spill;Transfer operation;Overfill	Catch basin	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	FP-TK02	Op Services	Utilities	K-85	Fuel	Transfer operation;Overfill	Catch basin	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	4	FTS-SA01	Op Services	Utilities	N of Clarifier	Gear Oil	Transfer operation;Overfill	Pan	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	PWWT-SA02	Op Services	Utilities	K-139	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	4	ULPH-SA01 (UTPH-SA01?)	Op Services	Utilities	Lake Pumphouse	Various Oils	Leak/spill	Catch basin	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training -Signage posted prohibiting chemicals/oils inside pumphouse	High	None
Storage area	5	PKLM-SA12	Sheet	Pickle Line	P-103	Various Oils, Kerosene	Leak/spill	Building	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	5	PKLM-LD02	Sheet	Pickle Line	M-103	Hydraulic oil	Leak/spill;Transfer operation	Building	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	5	PKLM-LD04	Sheet	Pickle Line	L-115	Hydraulic oil	Transfer operation	Building	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	PKLM-TK14, TK15, TK29, TK30	Sheet	Pickle Line	N-109	Hydraulic oil	Leak/spill;Manhole;Transfer operation;Overfill	Catch basin	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	PKLM-TK31	Sheet	Pickle Line	M-111	Hydraulic oil	Leak/spill	Building; storm sewer manhole is sealed	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	PKLM-TK32	Sheet	Pickle Line	M-105	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TFG-SA01	Tin		E-113	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	ETCM-SA09	Tin	Chrome Line	D-93	Hydraulic oil	Transfer operation;Overfill	Pan	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETCM-TK02	Tin	Chrome Line	E-105	Hydraulic oil	Transfer operation;Overfill	Portable containment; Building/mill floor	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETCM-TK05	Tin	Chrome Line	E-91	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Drip pan; Basement/mill floor	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Tank	5	ETCM-TK22	Tin	Chrome Line	E-95	Used oil	Leak/spill;Transfer operation;Overfill	Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	ANCA-SA03	Tin	Continuous Anneal	G-119	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ANCA-TK01	Tin	Continuous Anneal	G-101	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ANCA-TK04	Tin	Continuous Anneal	G-119	Hydraulic Oil	Transfer operation;Overfill	Catch Basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	DCRM-SA01	Tin	DCR Mill	F-131	Lubrication	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	DCRM-SA05	Tin	DCR Mill	G-123	Lubrication	Leak/spill;Overfill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	DCRM-TK09A, TK09B, TK09C	Tin	DCR Mill	F-125	Hydraulic oil	Transfer operation;Overfill	Portable Containment/Building/ Mill Floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	DCRM-TK10	Tin	DCR Mill	F-125	Hydraulic oil	Leak/spill;Valve(s);Transfe r operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	DCRM-TK11A, TK11B	Tin	DCR Mill	F-129	Rolling oil	Leak/spill;Valve(s);Transfe r operation;Overfill	Pit/tray	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	DCRM-TK13	Tin	DCR Mill	G-125	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Building/Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	RCL2-SA02	Tin	Recoil #2	E-132	Lubrication	Leak/spill;Valve(s);Transfe r operation;Overfill	Portable Containment/Building/ Mill Floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	RCL2-SA03	Tin	Recoil #3	E-127	Various Oils		Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	RCL2-TK01	Tin	Recoil #4	E-129	Hydraulic oil	Leak/spill;Valve(s);Transfe r operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	ETLM-SA02	Tin	Tin Line	F-87	Coating oil	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETLM-TK01	Tin	Tin Line	F-113	Hydraulic oil	Leak/spill;Valve(s);Transfe r operation;Overfill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETLM-TK02	Tin	Tin Line	F-113	Hydraulic oil		Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETLM-TK09	Tin	Tin Line	F-87	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 104 and 004 Drainage Areas

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Tank	5	ETLM-TK10	Tin	Tin Line	F-87	Hydraulic oil	Transfer operation;Overfill	Building/mill floor	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETLM-TK11	Tin	Tin Line	F-87	Hydraulic oil	Transfer operation;Overfill	Portable containment	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TMTM-TK07	Tin	Tin Temper Mill	F-133	Hydraulic oil	Overfill	Pit/tray	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TMTM-TK08	Tin	Tin Temper Mill	G-133	Hydraulic oil	Transfer operation;Overfill	Portable Containment/Building/ Mill Floor	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TMTM-TK09	Tin	Tin Temper Mill	G-135	Lubrication	Transfer operation;Overfill	Building/mill floor	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TMTM-SA02	Tin	Tin Temper Mill	F-137	Various Oils & Grease	Leak/spill; Transfer operation	Building	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TMTM-SA03	Tin	Tin Temper Mill	F-137	Various Oils & Grease	Leak/spill; Transfer operation	Building	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TMTM-SA01	Tin	Tin Temper Mill	G-137	Various Oils & Grease	Leak/spill; Transfer operation	Building	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CONT-ST-TK05 (formerly STC-TK01)	Op Services	Transportation	North of Delray Building	Diesel	Transfer operation	Catch basin	-Quarterly inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Potential spills and leaks from delivery trucks	4	TMP Parking Lot Manhole	Tin	Tin Mill	TMP Parking Lot	oils, fuels, delivered chemicals	leaks/spills have potential to impact 004 storm sewer directly via open grate manhole	None feasible	-Quarterly inspections -Posted warning sign/procedure -Spill Kit near area	Low	None
Potential spills and leaks from delivery trucks	4	Manhole CB1 in Final Treatment Area	Utilities	Utilities	Final Treat	oils, fuels, delivered chemicals	leaks/spills have potential to impact 004 storm sewer directly via open grate manhole	None feasible	-Quarterly inspections -Posted warning sign/procedure -Spill Kit near area	Low	None
Potential spills and leaks from vehicles	5	Manholes along Portside Facility roadway	MWP	MWP	Portside Energy	oils, fuels, delivered chemicals	leaks/spills have potential to impact 004 storm sewer directly via open grate manhole	None feasible	-Quarterly inspections -Posted warning sign/procedure -Spill Kit near area	Low	None
Loading/ unloading zone	4	Final Treat (North)	Op Services	Utilities	Final Treat	Lime Slurry	Transfer operation;Overfill	Containment	Loading/unloading procedures	Low	None
Loading/ unloading zone	4	Final Treat (North)	Op Services	Utilities	Final Treat	ChemTreat Chemicals	Transfer operation;Overfill	Containment	Loading/unloading procedures	Low	None
Loading/ unloading zone	4	Final Treat (North)	Op Services	Utilities	Final Treat	Sulfuric Acid	Transfer operation;Overfill	Containment	Loading/unloading procedures	Low	None
Loading/ unloading zone	4	Lake Pumphouse	Op Services	Utilities	Lake Pumphouse	Sodium Hypochlorite	Transfer operation;Overfill	Building, Berm to north	Loading/unloading procedures	Low	None

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Loading/ unloading zone	4	Sludge Dewatering	Op Services	Utilities	Sludge Dewatering	Lime Slurry	Transfer operation;Overfill	Proximity to sewers, Grassy area	Loading/unloading procedures	Low	None
Loading/ unloading zone	4	Sludge Dewatering	Op Services	Utilities	Sludge Dewatering	MgOH	Transfer operation;Overfill	Proximity to sewers, Grassy area	Loading/unloading procedures	Low	None
Heavy Equipment Parking and Repair	5	Transportation Garage	Op Services	Transportation	Transportation	Oil, Grease, particulates, Gasoline, kerosene, diesel	Leak/ spill, overfill	Building	None	Low	None
Sawdust	5	Carpenter Shop	Op Services	Utilities	Carpenter Shop	Particulates	Wind, Spill	Building	None	Low	None
Packer Box	4	UT-11, North End	Op Services	Utilities	UT-11	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	4	Final Treat North	Op Services	Utilities	Final Treat	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	5	TMP Parking Lot	Tin	Parking Lot	TMP Parking Lot	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	4	Boiler House, North Door	Op Services	Utilities	Boiler House	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	4	Final Treat South	Op Services	Utilities	Final Treat	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	4	AE-8, NW End	Op Services	Utilities	AE-8	Waste	Pickup, Overfill	None	Waste Management	Low	None
Sludge Filter Cakes (Hazardous Wastes)	3	Greenbelt II Landfill	N/A	Environmental	Greenbelt II Landfill	Oil, Grease, Metals, particulates	Leak/spill, transfer operations	Isolated Drainage Area, Storm Water Accumulation is pumped to Final Treat	Weekly Inspections	Low	None
Sludge Filter Cakes (Hazardous Wastes)	2, 3	Greenbelt I Landfill	N/A	N/A	Greenbelt I Landfill	Oil, Grease, Metals, particulates	None, Landfill no longer in use	Landfill closed and capped, belongs to National Steel Trust	Inspections	Low	None
Unknown buried waste	3, 6	Eastside SWMU	N/A	Environmental	Eastside SWMU	Oil, Grease, Metals, particulates	None, Area closed	Area closed and capped	Inspections	Low	None
Assorted Hazardous Waste	3	PCB Shed	N/A	Environmental	W-33	Mercury, Chrome, Acid, Aerosols	Transfer operations	Building and berms	Weekly Inspections	Low	None
Oily Waste Pad	3	Oily Waste Pad	Contractor	K&M	Y-10	Oil, Grease, Particulates	Transfer operations	Berms	loading/unloading procedures, solidified and transported to landfill on a regular basis	Low	None
750,000 Gallon Tank	3	West of GBII	Op Services	Utilities	XY-4	Storm Water, GB II Leachate	Overfill	Secondary Containment	None	Low	None
20 yard rolloff	3	Road to Landfill, Across from OWP			X-6	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff	4	Final Treat	Op Services	Utilities	Final Treat	Waste	Pickup, Overfill	None	Waste Management	Low	None
1000000 Gallon Tank	4	Final Treat (South)	Op Services	Utilities	Final Treat	NA	NA	Not in use	None	Low	None
Loading/ unloading	5	Pretreat	Op Services	Utilities	Pretreat	Sodium Bisulfite	Transfer Operations	Isolated Drainage Area	Loading/unloading procedures	Low	None
Loading/ unloading	5	Pretreat	Op Services	Utilities	Pretreat	Caustic	Transfer Operations	Isolated Drainage Area	Loading/unloading procedures	Low	None
Loading/ unloading	5	Pretreat	Op Services	Utilities	Pretreat	Sodium Bisulfite	Transfer Operations	Isolated Drainage Area	Loading/unloading procedures	Low	None
Loading/ unloading	5	Pretreat	Op Services	Utilities	Pretreat	ChemTreat Chemicals (2)	Transfer Operations	Isolated Drainage Area	Loading/unloading procedures	Low	None
Loading/ unloading	5	API/ Oil Intercepter	Op Services	Utilities	J-138	Chemtreat P841L, P817E	Transfer operations	Isolated Drainage Area	Loading/unloading procedures	None	None

Revision Date: 08/10/2015

Outdoor transformers are inspected quarterly under 40 CFR 761 requirements. Refer to PCB Program for details. None pose a direct risk to storm waters.
All storage tanks and transfer areas are inspected quarterly under the 40 CFR 112 requirements. Refer to SPCC Program for details. None pose a direct risk to storm water.

APPENDIX C

SWPPP Team Members Notification Lists

Storm Water Pollution Prevention Team

Area	Operating/Maintenance Area Personnel & Responsibility	Environmental Control Personnel & Responsibility
Plant SWPPP Administrator and Responsible Mgmt	Midwest Plant Area Manager - Plan implementation, maintenance, compliance, resources and training	Midwest Plant Env Compliance Manager and Water Compliance Manager - Plan development, compliance and implementation
Landfill	Utilities and Environmental Control personnel - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Repair Shops and Garages	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Contractors	Onsite Contractor Facilities - Develop plans, compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Pickle Line	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Sheet Production Areas	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Tin and Chrome Production Areas	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
WWT Facilities	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Utilities	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Contractor-ST Environmental	ST Environmental Personnel - Quarterly SWP3 inspections, plan development and maintenance	Midwest Plant Env Compliance Manager - Quarterly inspections, plan development and maintenance

Facility Emergency Contacts

ORGANIZATION/CONTACT	PLANT PHONE (OR 219-763-XXXX)
Energy Load Dispatcher (LD)	5151
Plant Security	5911
Plant Safety	5376
Industrial Hygiene	5376
Emergency Responders	
Fire Department.....	5911
Ambulance.....	5911
Environmental Emergency Coordinators	
Director, Environmental Control	SteelCom 8-444-4500 or (219) 888-4500
Environmental Compliance Manager – Midwest	5869
SPCC Manager, Environmental Control	SteelCom 8-444-3432 or (219) 888-3432 SteelCom 8-444-7938 or (219) 888-7938
On-Duty Environmental Manager	Contact LD

Federal and State Agency Notifications

AGENCY / EMERGENCY PERSONNEL	PHONE NUMBER	AUTHORIZED TO CALL
National Response Center (NRC)	(800) 424 - 8802	Environmental
Indiana Department of Environmental Management	(888) 233 - 7745	Environmental
U.S. Environmental Protection Agency - Region V (US EPA)	(312) 353 - 2318	Environmental
U.S. Coast Guard (USCG)	(219) 879 - 8371 [Michigan City, IN Station] (773) 768 – 4093	Environmental

Local and Community Emergency Notifications

AGENCY / EMERGENCY PERSONNEL	PHONE NUMBER	AUTHORIZED TO CALL
Local Emergency Planning Committee (LEPC) Porter Sheriff – after 4 pm	(219) 465 – 3593 8am–4pm (219) 477 – 3170	Environmental
Portage Fire Department	(219) 762 - 7404	Security
City of Portage, Sanitary Sewer Dept, Treatment Plant	(219) 762 - 1301 (219) 406 - 1205 (mobile, treatment plant mgr)	Environmental

Emergency Response Contractors

CONTRACTOR	TELEPHONE NUMBER	RESPONSE TIME	CONTRACT RESPONSIBILITY
Heritage Remediation Engineering, Inc. 24-hr..... Office..... Fax.....	 (219) 885 - 8014 (630) 739 - 1151 (630) 739 - 9491	Within 2 hours	Spill Response and Remediation
KM Plant Services Gary Office..... Highland, IN Office.....	 (219) 882 - 0060 (219) 933 - 1100	Within 2 hours	Spill Response and Remediation

APPENDIX D

Pesticide, Herbicide & Fertilizer Application

Herbicides, Pesticides and Fertilizers			
		Locations	
Product Name	Type of Product	East Side SWMU	Greenbelt II Landfill
Pathfinder II	Herbicide	X	X

Note: Hand held applications are done for grounds maintenance throughout the plant using "Round Up"-type herbicides.

Rev Date: 01/31/2014

APPENDIX E

Integrity Testing List

USS - Midwest Plant SPCC Plan - Appendix E
Non-Destructive Integrity Testing Tank List

Tank ID	Common Name	Capacity (gal)	Contents	Containment Material	Foundation Type	Age or Date Installed	Known Problems? (Y or N)	Shop Built? (Y or N)	Other Equivalent Protection? (Y or N)	Risk to Water	If round tank, Tank Dia. (ft)	If non-round tank, Tank Width (ft)	Tank Length/ Height (ft)	Insulated? (Y or N)	Elevation from Mill Floor (ft)	Test Type	Last Completed Test Date	Next Scheduled Test Date
CRS-5-TK14 A	80" CRM Rolling Oil Tank	9,000	Rolling Oil	Indoors	Steel Saddles	1960-70s	No	Y	Y	Low	11		12.5	Y	0	Integrity	2012	PE Comparitive Analyisis will be conducted after consistent test data obtained.
CRS-5-TK14 B	80" CRM Rolling Oil Tank	9,000	Rolling Oil	Indoors	Steel Saddles	1960-70s	No	Y	Y	Low	11		12.5	Y	0	Integrity	2012	
PKLM-TK27	Pickle Coating Oil Tank	13,500	Coating Oil	Indoors	Steel Saddles	2004	No	Y	Y	Low	10		23	Y	5	Integrity	NA	
Total No. of Tanks: 3																		Revision Date: 01 Jun 2016

PKLM-TK27 is a fairly new tank and it has been determined that a 10-yr interval is adequate for integrity testing.

APPENDIX F

Procedures

Doc# 70100003EMP
Title: Environmental Incident Reporting
Issue Dt: 08/09/1996
Revision Dt: 06/10/2014 Review Interval: 12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Environmental Incident Reporting
Loc: Environmental Control Division-Gary Works

70100003EMP - Environmental Spills and Releases

1.0 Purpose

1.1 This practice has been developed as guidance for reporting spills and environmental releases. This practice, when properly implemented, will ensure that releases of oil and/or hazardous substances are reported properly.

2.0 Scope

2.1 This practice applies to all Gary Works personnel whose job activities could result in an environmental spill or release, or the discovery of an environmental spill or release.

3.0 References

3.1 U. S. Steel Gary Works Integrated Contingency Plan.

4.0 Definitions

4.1 Environmental Incident is a release of any substance that escapes the process or equipment with potential impact to air, land or water, including releases to secondary containment, sewers and impervious surfaces.

4.2 Secondary containment is a safeguarding practice used to prevent the unauthorized release of toxic or hazardous substances from the primary containment (tank) into work areas (i.e. cement walls or poly container that is 110% of the volume of the tank it is containing).

4.3 Flammability is the measure and degree by which a chemical substance will burn or ignite, causing fire or combustion.

4.4 Corrosivity is the measure and degree by which a chemical substance will corrode or deteriorate other substances; either as an acidic corrosive and/or a caustic (basic) corrosive.

4.5 Volatility is the measure and degree by which a liquid and/or solid state chemical substance is converted to a gaseous state.

4.6 Toxicity is the measure and degree by which a chemical substance can sicken and damage a living organism.

5.0 Responsibilities

5.1 All personnel, including contractors and suppliers, are responsible for ensuring the implementation of this practice within Gary Works.

5.2 The Environmental Control Department will monitor Gary Works performance with respect to this practice.

6.0 General Practice

6.1 Incident Reporting

6.1.1 If a spill or environmental release occurs, the person responsible for or discovering the release must immediately communicate the incident to the

Doc# 70100003EMP
Title: Environmental Incident Reporting
Issue Dt: 08/09/1996
Revision Dt:06/10/2014 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Environmental Incident Reporting
Loc: Environmental Control Division-Gary Works

Load Dispatcher at 888-4451 (Gary and East Chicago) – for the Midwest Plant call 763-5151.

6.1.2 The incident is also to be communicated to the responsible individual's supervisor.

6.1.3 The following information must be communicated to the Load Dispatcher:

(a) Name, division and plant telephone extension of the individual reporting the incident;

(b) Identity of the substance released; i.e., gasoline, diesel fuel, lubricating oil, hydraulic fluid, antifreeze, coke oven gas, PCB, etc;

(c) Identify the physical state of the substance released (i.e. solid, liquid, gaseous) and any known characteristic of the substance released; if possible (i.e. flammability, corrosivity, volatility, toxicity, etc.)

(d) The medium or media into which the release occurred; i.e., land, water, air, plant sewers, secondary containment, etc.;

(e) An estimate of the quantity released, if possible;

(f) An estimate of the area (in square feet) affected by the release;

(g) Time and duration of the release;

(h) The exact location of the release; and

(i) Whether additional assistance, such as from the Hazardous Materials Responders, is required.

6.2 The Load Dispatcher will contact the Environmental Control Manager on duty and record the call in the Environmental Incident Reporting System.

7.0 Practice Approval

7.1 Approved for Principle and Practice:

Director, Environmental Control

CONSEQUENCES OF NON-COMPLIANCE: Non-compliance with environmental procedures could result in harm to the environment and may expose the company and responsible individuals to enforcement actions that could include civil or criminal penalties for violations of environmental laws, rules and/or permit conditions.

Doc# 70100004EMP
Title: General Spill Cleanup Guidance
Issue Dt: 08/09/1996
Revision Dt:05/26/2015 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: General Spill Cleanup Guidance
Loc: Environmental Control Division-Gary Works

70100004EMP - Spill Cleanup

1.0 Purpose:

1.1 This guidance document is to assist Gary Works personnel whose responsibilities include the cleanup of spilled materials. This document can also be referenced by contractors or outside organizations as guidance when developing their own practices for cleanup of spilled materials.

2.0 Scope:

2.1 This document applies to all personnel whose job activities include spill cleanups and/or the management and oversight of spill cleanups.

3.0 References:

3.1 USS Gary Works Integrated Contingency Plan (ICP)

3.2 USS Environmental Management Practice, "Incident Reporting", 70100003EMP

3.3 USS Environmental Management Practice, "Waste Characterization and Classification Guidance", 70100015EMP

3.4 USS Environmental Management Practice "Internal Waste Shipment Bill of Lading Manifesting Guidance", 70100013EMP

3.5 USS Environmental Management Practice "Hazardous Waste Shipping/Disposal Guidance", 70100019EMP

4.0 Definitions:

None

5.0 Responsibilities:

5.1 All employees are responsible for ensuring the implementation of this practice. The Environmental Control Department will provide assistance and monitor implementation of this practice.

6.0 General Practices:

6.1 Spill Reporting

6.1.1 Upon discovery of a spill, follow the guidelines for incident reporting (see 70100003EMP).

6.2 Spill Containment

6.2.1 If the spill is of a continuing nature and/or has potential for further environmental impact, a containment structure must be constructed to minimize adverse impacts. The structure must be of a size and material to contain the spill until a method of removal can be established.

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6.3 Spill Cleanup

6.3.1 Persons responsible for implementing this general practice can obtain specific spill cleanup guidance by contacting the Environmental Control Department to determine: the hazards of the material, the method for clean up, waste determination (hazardous or non-hazardous), appropriate containers for storage, labeling requirements and disposal locations. Do not contaminate the spill clean up material with hazardous waste.

6.3.2 Oil, Glycol and Organic Liquid Spill Cleanup

6.3.2.1 If oil, glycol or organic liquid is spilled onto an impervious surface, the spilled material shall be cleaned up using a vacuum truck or absorbent materials depending on the volume and characteristics of the spilled material.

6.3.2.2 If oil, glycol or organic liquid is spilled onto unlined surfaces, use a vacuum truck or absorbent materials to first recover standing liquids.

6.3.2.3 Spent absorbent materials must be placed in appropriate, dedicated containers for proper disposal of special waste.

6.3.2.4 Visually impacted soil must be removed by excavation.

6.3.2.5 Excavated soils/fill and absorbent materials must be placed in appropriate, dedicated containers for proper disposal of special waste.

6.3.3 Acid/Caustic Spill Cleanup

6.3.3.1 If acid/caustic is spilled onto an impervious surface and standing liquids can be recovered for re-use, the spilled acid/caustic should be collected and returned to the process.

6.3.3.2 *If the spilled acid/caustic cannot be re-used, the acid/caustic and contaminated soil must be neutralized to a pH range of 6 - 8 and disposed of properly (see 6.3.5 below) after waste characterization. Contact Environmental Control for specific guidance.

6.3.4 Tar spill clean up

6.3.4.1 If absorbent material is required to facilitate clean up of tar then coal or coal fines must be used in order for the spilled material to be suitable for recycle. Do not use slag or other such material.

6.3.4.2 Ensure tar spill clean up is placed in tar recycle boxes only. Do not contaminate other material or place other unaffected material in recycle boxes.

6.3.5 Spill Cleanup for Process Materials and Waste Streams

Doc# 70100004EMP
Title: General Spill Cleanup Guidance
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Cat: Environmental Doc Type: EMP
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Desc: General Spill Cleanup Guidance
Loc: Environmental Control Division-Gary Works

6.3.5.1 *Practices for spills of process materials and waste streams depend on the nature of the chemical or mixture of chemicals released and magnitude of the spill event. Contact Environmental Control for specific guidance.

6.3.6 Disposal of Spill Cleanup Materials

6.3.6.1 Residual materials from spill cleanup activities must be disposed in accordance with the following established disposal Practices:

- 70100015EMP Waste Characterization And Classification Guidance
- 70100013EMP Internal Waste Shipment Bill of Lading Manifesting Guidance
- 70100019EMP Hazardous Waste Shipping/Disposal Guidance

7.0 Practice Approval:

7.1 Approved for Principle and Practice.

Director, Environmental Control

CONSEQUENCES OF NON-COMPLIANCE: Non-compliance with environmental procedures could result in harm to the environment and may expose the company and responsible individuals to enforcement actions that could include civil or criminal penalties for violations of environmental laws, rules and/or permit conditions.

Doc# 70100005EMP
Title: Mobile Container Storage, Containment and Inspection
Issue Dt: 08/09/1996
Revision Dt:05/06/2015 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Mobile Container Storage, Containment and Inspection
Loc: Environmental Control Division-Gary Works

70100005EMP - EMS Compliance

1.0 Purpose

1.1 This practice has been developed as guidance to achieve compliance with regulatory requirements and Gary Works Environmental Management System (EMS). This practice, when properly implemented, will prevent releases from drums and bulk/mobile storage containers. Each business unit may supplement this practice as necessary.

2.0 Scope

2.1 This practice applies to all Gary Works personnel whose job activities include the use, storage or transportation of material in drums and bulk/mobile storage tanks.

3.0 References

3.1 Gary Complex Spill Prevention Control and Countermeasure (SPCC) Plan

4.0 Definitions

4.1 A mobile storage container is any container designed to store oil, grease, or a chemical product in quantities which allow movement of the container. Mobile storage containers include drums, totes, pails, portable tanks, and other similar containers.

5.0 Responsibilities

5.1 Business Unit management is responsible for ensuring the implementation of this practice and ensuring the accuracy of drum and storage tank inventories.

5.2 *The Environmental Control Department is responsible for providing assistance and monitoring performance on implementation of this practice through the SPCC Plan inspections and corrective action follow up.

6.0 General Practice

6.1 Drum and Storage Tank Inventories

6.1.1 Environmental Control maintains an inventory of designated storage areas for drums, totes and other mobile oil storage containers in accordance with SPCC requirements (hazardous material containers may or may not be included in this inventory of designated storage areas).

6.2 Drum Placement and Containment

6.2.1 Each Business Unit shall utilize established drum/mobile container storage areas.

6.2.2 Each drum/mobile container storage area should be placed at least forty (40) feet from any main roadway, sewer, catch basin, drainage ditch, outfall, or shoreline. If this isn't possible, then other protective measures, such as secondary containment, must be in place. In addition, storage areas and containment systems must be sheltered from any overhead liquid pipelines.

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Title: Mobile Container Storage, Containment and Inspection
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Desc: Mobile Container Storage, Containment and Inspection
Loc: Environmental Control Division-Gary Works

6.2.2.1 Oils, greases, chemicals, or other contaminants should not be stored in areas that drain and discharge to a clean water sewer.

6.2.3 Each drum/mobile container storage area shall be clearly marked to indicate the type(s) of material that can be stored (i. e., lubricating oils, hydraulic oils, antifreeze, waste oils, etc.). Refer to the appropriate Safety and Industrial Hygiene Procedures for further labeling requirements, such as NFPA placarding.

6.2.4 Under no circumstances are incompatible materials such as acids or caustics to be stored within the same designated area. Materials must be stored forty feet apart or have an impermeable barrier between the incompatible materials.

6.2.5 Drums that are not in use shall be stored in an upright position with bung caps intact. Empty drums must also be stored with bung caps intact.

6.3 Storage Tank Placement and Containment

6.3.1 Mobile storage containers should be placed at least forty (40) feet from any main roadway, sewer, catch basin, drainage ditch, outfall or shoreline. If this isn't possible, then other protective measures, such as secondary containment, must be in place. In addition, storage areas and containment systems must be sheltered from any overhead liquid pipelines.

6.3.1.1 Oils, greases, chemicals, or other contaminants should not be stored in areas that drain and discharge to a clean water sewer.

6.3.2 Each storage area of oil and/or hazardous substances shall be provided with a secondary containment system capable of holding 110% of the volume of the largest container stored within the containment area.

6.3.3 Each secondary containment area must be constructed from either of the following:

(a) Fabricated metal pans with welded seams;
(b) Curbed concrete pads;
(c) Concrete pad with sealed metal sidewalls;
(d) Plastic or fiberglass tubs
(e) Any other equivalent containment system designed to contain stored materials for at least 72 hours.

6.3.4 Each secondary containment unit shall be maintained free of excess accumulations of precipitation, debris, foliage, etc. Accumulated storm water, or storm water mixed with the stored contents, must be disposed in a proper manner (i.e. accumulated storm water mixed with contents of the storage vessel cannot be drained to the ground. Contact the area Environmental Compliance Manager for disposal locations).

6.3.5 Any valve connections, level gauges, etc. must be maintained within the secondary containment unit and must be free of leaks and drips.

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Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Mobile Container Storage, Containment and Inspection
Loc: Environmental Control Division-Gary Works

6.3.5.1 Transfer lines other than flexible hoses used for refilling equipment shall be hard piped and must be free of leaks and drips.

6.3.5.2 Flexible transfer hoses must be equipped with automatic shut-off nozzles, and when not in use, the entire hose shall be maintained inside the secondary containment unit with the nozzle hanging in an up-right position. All hose connections must be free of leaks and drips.

6.3.5.3 Any overflows must be directed into containment.

6.3.6 Each storage area should be equipped with spill kits of adsorbent/absorbent materials (i.e. Oil Dri ®, absorbent pads, pillows, socks, etc.) to contain and clean-up spilled materials.

6.4 Inspections for Mobile Container Storage Areas

6.4.1 *Inspections of mobile container storage areas are to be performed by the SPCC Maintenance and Inspection designee(s) on a quarterly basis in accordance with the SPCC Plan. The SPCC Professional Engineer will determine the frequency of the inspections. Mobile containers storing hazardous materials may also be stored in these areas and may be inspected as part of the SPCC inspection for that respective mobile container storage area. Ensure the provisions of 6.2.4 are being complied with in these storage areas.

6.5 Material Spills

6.5.1 Upon discovery of a spill from a liquid material storage area, follow the guidelines for spill reporting specified in Environmental Management Practice 70100003EMP, Incident Reporting.

6.5.2 Spill response and cleanup shall follow guidelines specified in Environmental Management Practice 70100004EMP, General Spill Cleanup Guidance.

7.0 Practice Approval

7.1 Approved for Principle and Practice.

Director, Environmental Control

CONSEQUENCES OF NON-COMPLIANCE: Non-compliance with environmental procedures could result in harm to the environment and may expose the company and responsible individuals to enforcement actions that could include civil or criminal penalties for violations of environmental laws, rules and/or permit conditions.

Doc# 70100008EMP
Title: Oil and Hazardous Substance Loading and Unloading Practices
Issue Dt: 08/09/1996
Revision Dt:01/03/2014 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Oil and Hazardous Substance Loading and Unloading Practices
Loc: Environmental Control Division-Gary Works

70100008EMP - Loading and Unloading of Oil and Oil Containing Substances

1.0 Purpose

1.1 This practice describes environmental regulatory requirements, aside from normal safety precautions, for loading and unloading oil and hazardous materials at Gary Works.

2.0 Scope

2.1 This practice applies to all personnel, including Suppliers who load or unload bulk oil or hazardous materials at USS Gary Works.

3.0 References

3.1 Gary Works Spill Prevention Control and Countermeasures Plan (SPCC)

3.2 Gary Works Integrated Contingency Plan (ICP)

3.3 Gary Works Facility Response Plan (FRP)

4.0 Definitions

None

5.0 Responsibilities

5.1 Each Business Unit is responsible for ensuring proper loading and unloading of oil and hazardous materials.

6.0 General Practice

6.1 Bulk Material Transfers of Oil and Hazardous Substances – Containment

6.1.1 Delivery drivers are responsible for compliance with all Department of Transportation (DOT) procedures. Drivers must ensure all applicable safety activities are completed for transfer operations such as grounding, pinning, hold downs, chocking wheels, etc. Drivers must also ensure all gaskets, fittings and disconnects are in good operating condition.

6.1.2 If area containment is not present, ensure portable drip pans or trays are in place before transferring material.

*6.1.3 If area is contained, ensure that containment is free of liquids and debris prior to initiating transfer activity.

*6.1.3.1 Properly position truck on containment pad prior to offloading to ensure that any spills will be captured.

*6.1.4 Inspect all outlets and drains on the delivery vehicle prior to transfer of material and ensure all valves are in the correct position prior to transferring material.

*6.1.5 Transfer of material must be manned at all times to ensure prevention of spills and releases from overfill. Reliance on an automatic shut-off nozzle does not exempt the driver from continuously manning the operation. Ensure tank levels are monitored throughout the transfer operation.

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*6.1.6 Ensure all equipment is functioning as designed. Interim procedures must be developed and approved by the Area Manager or designee prior to deviating from standard operating procedures.

*6.1.7 Immediately terminate material transfer upon evidence of leakage.

*6.1.8 Close all valves before disconnecting hoses and ensure all transfer hoses are disconnected prior to moving vehicle or equipment.

*6.1.9 Where applicable, ensure flexible tank hoses/pipes are placed and maintained inside the secondary containment unit to contain potential leaks and drips.

*6.1.10 Prior to departure, inspect for discharges at all outlets on the vehicle, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

*6.1.11 All drivers must know the clearance height of their vehicle and be aware of overhead pipelines, structures, and utility lines throughout the facility.

*6.2 Bulk Material Transfers of Oil and Hazardous Substances – Equipment

*6.2.1 Departmental Personnel are responsible to ensure that all process piping and equipment is suitable for transfer operations.

*6.2.1.1 Ensure all equipment inspections and verifications are performed at prescribed frequencies.

6.3 Spill Reporting

6.3.1 Upon discovery of a spill, the person responsible for, aware of, or discovering the spill or release must follow the guidelines for incident reporting specified in Environmental Management Practice 70100003EMP. Report all spills to the Load Dispatcher at 219-888-4451.

6.4 Spill Response

6.4.1 All spill response and cleanup including material disposal, shall follow guidelines specified in Environmental Management Practice 70100004EMP.

7.0 Practice Approval

7.1 Approved for Principle and Practice.

Director, Environmental Control

CONSEQUENCES OF NON-COMPLIANCE: Non-compliance with environmental procedures

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could result in harm to the environment and may expose the company and responsible individuals to enforcement actions that could include civil or criminal penalties for violations of environmental laws, rules and/or permit conditions.

Doc# 70100042EMP
Title: SPCC Program Management
Issue Dt: 09/18/2015
Revision Dt:10/20/2015 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: SPCC Program Management
Loc: Environmental Control Division-Gary Works

1. Scope
   1.1. This standard shall apply to and be understood by all personnel involved with Spill Prevention, Control, and Countermeasure (SPCC) program management, including the responsible Environmental Control manager(s), employees and/or contractors conducting bulk storage container inspections, Division employees responsible for scheduling and completing maintenance and corrective work on bulk oil containers, employees and/or contractors who maintain the SPCC Plan, and the certifying Professional Engineer (PE).

2. Purpose
   2.1. The purpose of this procedure is to provide a general guideline for compliance with SPCC requirements at U.S. Steel Gary Complex.

3. References
   3.1. 40 CFR 112 – SPCC Regulations
   3.2. United States Steel Corporation Gary Works Spill Prevention, Control, and Countermeasure (SPCC) Plan
   3.3. USS Environmental Management Practice, *70100003EMP Incident Reporting*
   3.4. SPCC Inspection Field Checklists

4. Definitions
   4.1. *Oil* means oil of any kind or in any form, including, but not limited to: petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.
   4.2. *Bulk storage container, or storage tank,* means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.
   4.3. *Oil storage area* means any space designated for the storage of one or more bulk oil storage containers, including tanks, drums, and/or totes. The number of containers present in storage areas may vary, and storage areas are inspected as a single area, not as individual containers.
   4.4. *Loading station* means the end terminal projected from a bulk oil storage container, usually connected by piping, intended to move oil from the bulk storage container to an end user, such as a mobile refueler or a vehicle.

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4.5. *Mobile equipment storage areas* are designated parking areas for one or more large mobile equipment units not in use.

4.6. *Grease station* means the end terminal projected from a bulk grease storage container, usually connected by piping intended to move grease from the bulk storage container to the end user.

4.7. For other definitions, see 40 CFR 112.2.

5. Responsibilities

5.1. Environmental Control is responsible for:

5.1.1. Reviewing the entirety of the SPCC Plan at least once every five (5) years and revising in accordance with SPCC regulations;

5.1.2. Reviewing this procedure at least once every year and updating as necessary;

5.1.3. Communicating revisions to any inspectors, operating divisions, or others who may be affected;

5.1.4. Reviewing and approving reports of SPCC findings;

5.1.5. Ensuring that inspectors have received adequate training to make compliance determinations; and

5.1.6. Ensuring that the inspections are performed in accordance with this procedure on a regular schedule.

5.2. The designated inspection group is responsible for:

5.2.1. Signing in at with the owning operating division before beginning inspections;

5.2.2. Completing any pre-job safety paperwork and/or training required by each owning operating division before beginning inspections;

5.2.3. Inspecting all bulk oil storage containers on a quarterly basis according to the SPCC inspection field checklists;

5.2.4. Reporting findings to Environmental Control;

5.2.5. Notifying Environmental Control when discrepancies are observed between the field inventory and the written SPCC Container Inventory; and

5.2.6. Reporting environmental incidents observed during the inspections to the Load Dispatcher at (219) 888-4451.

5.3. Owners of inspected assets (operating divisions) are responsible for:

5.3.1. Providing inspectors with any pre-job safety paperwork or training required for visitors;

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5.3.2. Completing the corrective actions listed in the quarterly SPCC report by the completion date listed;

5.3.3. Contacting Environmental Control before installing, removing, or altering SPCC assets.

5.4. The certifying professional engineer is responsible for:

5.4.1. Ensuring that the provisions of the SPCC Plan are in accordance with good engineering practices

6. General Practices

Inspections

6.1. The SPCC inspection group inspects the SPCC assets at each operating division on a quarterly basis. The SPCC Access database holds the list of assets to be inspected.

6.2. Inspections are conducted according to the SPCC inspection field checklists, which list the compliance requirements for each type of asset. The field checklist states whether conditions indicate the container is in compliance, needs corrective action, or requires that an environmental incident be reported.

6.2.1. If the inspectors witness an environmental incident, then they must report the incident to the Load Dispatcher at ext. 4451 according to *70100003EMP Incident Reporting*. Environmental Control will respond to the incident and track all corrective actions to completion using the ESS incident tracking system.

6.2.2. The inspectors shall record all other findings in the quarterly SPCC report for each operating division. The report shall indicate the compliance issue observed, the appropriate corrective action to fix it, and the date by which the corrective action should be completed.

Reporting

6.3. The inspectors will assign one of the following codes to each finding to identify the urgency of the finding:

6.3.1. Priority 1 – A major non-compliance issue exists. A minor change in conditions may result in a release. Correct within 15 days.

6.3.2. Priority 2 – A non-compliance issue exists, but it does not require immediate attention. Correct within 3 months.

6.3.3. Priority 3 – A minor non-compliance issue exists, but it will require long-term planning or available funds to correct. Correct within 6 months.

6.4. Environmental incidents reported during an inspection will not be identified and tracked using the Access database. Environmental Control will use the ESS incident reporting system to track corrective and preventive actions for incidents.

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6.4.1. If the inspectors determine that an asset's condition warrants non-destructive testing to assess its structural integrity, then the inspectors shall notify Environmental Control. Information on candidates for non-destructive testing is stored separately from the Access database and quarterly reports.

6.5. When inspectors complete the quarterly SPCC report, they shall send it to Environmental Control for review. Environmental Control will either:

6.5.1. Approve the report as written, notify the inspectors of approval, and send the report to the appropriate operating division; or

6.5.2. Note changes needed to the report's findings or corrective actions and send the marked up copy to the inspectors.

6.5.2.1. If the inspectors state that they agree with the changes, then Environmental Control will make the final changes to the report using the Access database and send it to the appropriate operating division.

6.5.2.2. If the inspectors state that they disagree with the changes, then the inspectors and Environmental Control will discuss the items further before Environmental finalizes the report and sends it to the operating division.

Corrective Actions / Inventory Changes

6.6. Upon receipt of the quarterly SPCC report, division management reviews the report and assigns the corrective actions to be completed by the dates listed in the report. Division management informs Environmental Control as the corrective actions are completed.

6.7. Corrective actions will be marked as closed in the database either:

6.7.1. When Environmental Control and/or the inspectors receive verbal or written communication from the operating division that corrective actions have been completed; or

6.7.2. When Environmental Control and/or the inspectors physically observe that the findings have been corrected.

6.8. At the end of each month, the inspectors will generate a report for each division listing the remaining open corrective actions due in the next 45 days and send the reports to Environmental Control. Except during the month when the quarterly report is sent, Environmental Control will send each division a monthly update report as a reminder of the remaining corrective actions.

6.9. When an operating division wishes to add, remove, or alter an SPCC asset, it must communicate the desired change to Environmental Control to ensure the change is compliant with SPCC regulations. If the change is approved, then Environmental

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Control will collect information about the tank to include in the SPCC Plan and in the SPCC Access database.

SPCC Plan

6.10. The most updated revision of the SPCC Plan shall be kept on the Environmental Control website.

6.11. In accordance with regulations, all parts of the plan shall be reviewed at least once every five years. Individual sections of the plan may be reviewed and revised as needed.

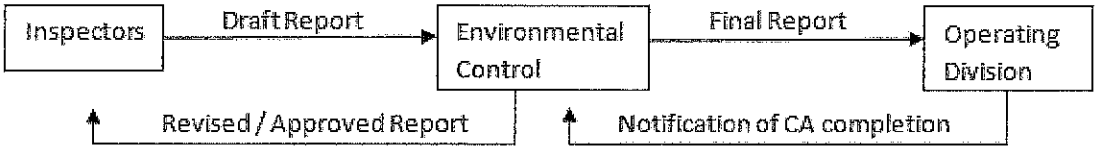
6.12. The plan includes a discussion of how U.S. Steel Gary Complex meets the federal requirements, an inventory of all SPCC-regulated assets, and a map which identifies locations.

6.12.1. During regularly scheduled inspections, the inspection group compares the field inventory to the SPCC container inventory. If discrepancies are observed (fixed assets are removed or new assets have been added), then the inspection group notifies Environmental Control.

6.12.2. On an annual basis, Environmental Control conducts spill prevention briefings with each operating division. During this meeting, Environmental Control and division management review the SPCC container inventory and mark any necessary is updated with the new inventory.

6.13. A Professional Engineer certifies that the plan has been prepared in accordance with good engineering practices.

7. SPCC Reporting Flow Diagram



8. Approval

Approved for use:

Director, Environmental Control

Consequences of Non-Compliance: Non-compliance with environmental procedures could result in harm to the environment and may expose the company and responsible individuals to enforcement actions that could include civil or criminal penalties for violations of environmental laws, rules and/or permit conditions.

Grease Stations / Portable Lube

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Storage container and associate piping	Compliant	Needs Corrective Action	Incident
Drip marks	No/normal drip marks	Drip marks indicate tank leak or piping leak	N/A
Corrosion, punctures, and cracks	No corrosion / superficial corrosion	Extensive corrosion could result in release from tank	N/A
Nozzle and fittings	No drips from nozzle and fittings	Nozzle and/or fittings are dripping oil	N/A
Spill Kit	Container storage area has a nearby spill kit or spill materials	Storage area has no nearby spill kit or spill materials	N/A

Secondary containment	Compliant	Needs Corrective Action	Incident
Secondary containment	A release cannot reach nearby storm drains	A release could reach a nearby storm drain	N/A
	Outdoors with container - containment can hold 110% of tank capacity	Containment cannot hold 110% of tank capacity	N/A
	Outdoors with no container - stored on concrete or impervious surface	Tank is on pervious surface	N/A
Drip pan	Loading stations have a drip pan or suitable containment	Loading stations have no drip pan or containment to catch small spills or drips during oil transfer	N/A

Loading Stations

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Nozzle and associated piping	Compliant	Needs Corrective Action	Incident
Drip marks	No / normal drip marks	Drip marks indicate tank leak or piping leak	N/A
Corrosion, punctures, and cracks	No corrosion / superficial corrosion	Extensive corrosion could result in release from loading station	N/A

Secondary containment	Compliant	Needs Corrective Action	Incident
Drip pan	Loading stations have a drip pan or suitable containment	Loading stations have no drip pan or containment to catch small spills or drips during oil transfer	N/A

Mobile Equipment Storage Areas

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Storage Area	Compliant	Needs Corrective Action	Incident
Spill kit	Mobile equipment storage area has a nearby spill kit or spill materials	Storage area has no nearby spill kit or spill materials	N/A

SPCC Inspection Field Checklist
08/04/15

Storage Areas

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Storage areas and associated piping	Compliant	Needs Corrective Action	Incident
Drip marks	No / normal drip marks	Drip marks indicate tank leak or piping leak	N/A
Corrosion, punctures, and cracks	No corrosion / superficial corrosion	Extensive corrosion could result in release from tank	N/A
Level indicator for tanks	Indicator is functional	Indicator is missing or nonfunctional	N/A
Interstitial monitor for double-walled tanks	Interstitial monitor is present and indicates no liquid in interstitial space	Indicator is missing, or indicates liquid in the interstitial space	N/A

Secondary containment	Compliant	Needs Corrective Action	Incident
Secondary containment	Area has secondary containment which can contain 110% of the capacity of the largest container	Secondary containment cannot contain 110% of the capacity of the largest container	N/A
Containers	No holes or cracks / only surface scratches	Holes or cracks such that container could not hold contents of tank	N/A
	No liquid or debris	Some liquid or debris	N/A
Nearby drains	A release could not reach any nearby storm drains	A release could reach a nearby storm drain	N/A

If an environmental incident is observed, call the Load Dispatcher at ext. 4451

SPCC Inspection Field Checklist
08/04/15

Storage Tanks / Grease Tanks

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Storage tank/grease tank and associated piping	Compliant	Needs Corrective Action	Incident
Drip marks	No / normal drip marks	Drip marks indicate tank leak or piping leak	N/A
Corrosion, punctures, and cracks	No corrosion / superficial corrosion	Extensive corrosion could result in release from tank	N/A
Level indicator	Indicator is functional	Indicator is missing or nonfunctional	N/A
Interstitial monitor for double-walled tanks	Interstitial monitor is present and indicates no liquid in interstitial space	Indicator is missing or indicates liquid in the interstitial space	N/A

Secondary containment	Compliant	Needs Corrective Action	Incident
Secondary containment	If outdoors - containment can hold 110% of tank capacity	Containment cannot hold 110% of tank capacity	N/A
Containers	No holes or cracks / only surface scratches	Holes or cracks such that container could not hold contents of tank	N/A
	No liquid or debris	Some liquid or debris	N/A
Nearby drains	A release cannot reach nearby storm drains	A release could reach a nearby storm drain	N/A

APPENDIX G

Inspection Checklists

USS Midwest Plant - Storm Water ,pact Locations – Inspection Checklist

Insp Date: Insp Name:

Area (Outfall)	ID	Column Reference (surface type)	Free of Debris and Leaves?	Sign of leaks/spills?	Types of Controls or Practices in Place:		Notes
					Type	OK?	
Employee Parking Lot (002)	B3	B33 (gravel)			Warning Sign(s)		
					Spill Kit		
					Barriers		
	B2G	A27 (gravel)			Warning Sign(s)		
					Spill Kit @ B3		
					Barriers		
	B2A	A15 (gravel)			Warning Sign(s)		
					Spill Kit		
					Barriers		
	B2B	A35 (gravel)			Warning Sign(s)		
					Spill Kit @ B2D		
					Barriers		
	B2C	A39 (gravel)			Warning Sign(s)		
					Spill Kit @B2D		
					Barriers		
	B2D	A43 (asphalt)			Warning Sign(s)		
					Spill Kit		
					Barriers		
	B2E	A48 (asphalt)			Warning Sign(s)		
					Spill Kit @ B2D		
					Barriers		
	B2F	A53 (asphalt)			Warning Sign(s)		
					Spill Kit @ B2D		
					Barriers		
	B4	B41 (asphalt)			Warning Sign(s)		
					Spill Kit @ B2D		
					Barriers		

USS Midwest Plant - Storm Water Impact Locations – Inspection Checklist

Inspection Date: Insp Name:

Area (Outfall)	ID	Column Reference (surface type)	Free of Debris and Leaves?	Sign of leaks/spills?	Types of Controls or Practices in Place:		Notes
					Type	OK?	
Employee Parking Lot (003)	C5A	A63 (asphalt)			Warning Sign(s)		
					Spill Kit		
					Barriers		
	C5B	A68 (asphalt)			Warning Sign(s)		
					Spill Kit@C5A		
					Barriers		
	C5C	A75 (asphalt)			Warning Sign(s)		
					Spill Kit @ C5A		
					Barriers		
	C5D	A81 (asphalt)			Warning Sign(s)		
					Spill Kit @ C5A		
					Barriers		
AE1 Parking Lot (002)	PD1	P1 (asphalt)			Warning Sign(s)		
					Spill Kit @ PD 3		
					Barriers		
	PD2	P2 (asphalt)			Warning Sign(s)		
					Spill Kit @ PD3		
					Barriers		
	PD3	P4 (asphalt)			Warning Sign(s)		
					Spill Kit		
					Barriers		
	PD4	P5 (asphalt)			Warning Sign(s)		
					Spill Kit @ PD3		
					Barriers		

USS Midwest Plant - Storm Water ,pact Locations – Inspection Checklist

Inspection Date: Insp Name:

Area (Outfall)	ID	Column Reference (surface type)	Free of Debris and Leaves?	Sign of leaks/spills?	Types of Controls or Practices in Place:		Notes
					Type	OK?	
TMP (004)	D10	C123 (asphalt)			Warning Sign(s)		
					Spill Kit		
					Barriers		
Warehouse 53A (002)	SW-CB	E5 (asphalt)			Warning Sign(s)		
					Spill Kit		
	S-CB	E-F5 (asphalt)			Warning Sign(s)		
					Spill Kit @ SW-CB		
					Barriers		
	SE-CB	F5 (asphalt)			Warning Sign(s)		
					Spill Kit @ SW-CB		
					Barriers		
Main Gate (002)	MG-1	C3 (asphalt)			Warning Sign(s)		
					Spill Kit @ SW-CB		
					Barriers		
Portside Energy (004)	CB8	E148 (asphalt)			Warning Sign(s)		
					Spill Kit @ CB4		
					Barriers		
	CB9	F148 (gravel)			Warning Sign(s)		
					Spill Kit @ CB4		
					Barriers		
	CB5	K148 (concrete)			Warning Sign(s)		
					Spill Kit @ CB4		
					Barriers		
	CB4	H148 (concrete)			Warning Sign(s)		
					Spill Kit		
					Barriers		

USS Midwest Plant - Storm Water Impact Locations – Inspection Checklist

Inspection Date: Insp Name:

Area (Outfall)	ID	Column Reference (surface type)	Free of Debris and Leaves?	Sign of leaks/spills?	Types of Controls or Practices in Place:		Notes
					Type	OK?	
Warehouse 51 (003)	C7	C83 (asphalt)			Warning Sign(s)		
					Spill Kit		
					Barriers		
Security / Main Employee Gate (003)	SW1	B57 (asphalt)			Warning Sign(s)		
					Spill Kit @NE1		
					Barriers		
	SE1	B57 (asphalt)			Warning Sign(s)		
					Spill Kit		
					Barriers		
	E1	B59 (asphalt)			Warning Sign(s)		
					Spill Kit @ SE1		
					Barriers		
	NE1	B61 (gravel)			Warning Sign(s)		
					Spill Kit		
					Barriers		
	NE2	B63 (asphalt)			Warning Sign(s)		
					Spill Kit @NE1		
					Barriers		
Final Treat (004)	CB1	A127 (gravel)			Warning Sign(s)		
					Spill Kit		
					Barriers		

SPCC Inspection Field Checklist
08/04/15

Grease Stations / Portable Lube

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Storage container and associate piping	Compliant	Needs Corrective Action	Incident
Drip marks	No/normal drip marks	Drip marks indicate tank leak or piping leak	N/A
Corrosion, punctures, and cracks	No corrosion / superficial corrosion	Extensive corrosion could result in release from tank	N/A
Nozzle and fittings	No drips from nozzle and fittings	Nozzle and/or fittings are dripping oil	N/A
Spill Kit	Container storage area has a nearby spill kit or spill materials	Storage area has no nearby spill kit or spill materials	N/A

Secondary containment	Compliant	Needs Corrective Action	Incident
Secondary containment	A release cannot reach nearby storm drains	A release could reach a nearby storm drain	N/A
	Outdoors with container - containment can hold 110% of tank capacity	Containment cannot hold 110% of tank capacity	N/A
	Outdoors with no container - stored on concrete or impervious surface	Tank is on pervious surface	N/A
Drip pan	Loading stations have a drip pan or suitable containment	Loading stations have no drip pan or containment to catch small spills or drips during oil transfer	N/A

If an environmental incident is observed, call the Load Dispatcher at ext. 4451

SPCC Inspection Field Checklist
08/04/15

Loading Stations

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Nozzle and associated piping	Compliant	Needs Corrective Action	Incident
Drip marks	No / normal drip marks	Drip marks indicate tank leak or piping leak	N/A
Corrosion, punctures, and cracks	No corrosion / superficial corrosion	Extensive corrosion could result in release from loading station	N/A

Secondary containment	Compliant	Needs Corrective Action	Incident
Drip pan	Loading stations have a drip pan or suitable containment	Loading stations have no drip pan or containment to catch small spills or drips during oil transfer	N/A

If an environmental incident is observed, call the Load Dispatcher at ext. 4451

Mobile Equipment Storage Areas

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Storage Area	Compliant	Needs Corrective Action	Incident
Spill kit	Mobile equipment storage area has a nearby spill kit or spill materials	Storage area has no nearby spill kit or spill materials	N/A

SPCC Inspection Field Checklist
08/04/15

Storage Areas

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Storage areas and associated piping	Compliant	Needs Corrective Action	Incident
Drip marks	No / normal drip marks	Drip marks indicate tank leak or piping leak	N/A
Corrosion, punctures, and cracks	No corrosion / superficial corrosion	Extensive corrosion could result in release from tank	N/A
Level indicator for tanks	Indicator is functional	Indicator is missing or nonfunctional	N/A
Interstitial monitor for double-walled tanks	Interstitial monitor is present and indicates no liquid in interstitial space	Indicator is missing, or indicates liquid in the interstitial space	N/A

Secondary containment	Compliant	Needs Corrective Action	Incident
Secondary containment	Area has secondary containment which can contain 110% of the capacity of the largest container	Secondary containment cannot contain 110% of the capacity of the largest container	N/A
Containers	No holes or cracks / only surface scratches	Holes or cracks such that container could not hold contents of tank	N/A
	No liquid or debris	Some liquid or debris	N/A
Nearby drains	A release could not reach any nearby storm drains	A release could reach a nearby storm drain	N/A

If an environmental incident is observed, call the Load Dispatcher at ext. 4451

SPCC Inspection Field Checklist
08/04/15

Storage Tanks / Grease Tanks

General	Compliant	Needs Corrective Action	Incident
Spills and/or puddles	No evidence of active or recent large spills	Oil staining or puddle suggests recent spill or leak small enough to be cleaned with materials in the immediate area	Active spill, leak, or puddle too large to be cleaned with materials in the immediate area

Storage tank/grease tank and associated piping	Compliant	Needs Corrective Action	Incident
Drip marks	No / normal drip marks	Drip marks indicate tank leak or piping leak	N/A
Corrosion, punctures, and cracks	No corrosion / superficial corrosion	Extensive corrosion could result in release from tank	N/A
Level indicator	Indicator is functional	Indicator is missing or nonfunctional	N/A
Interstitial monitor for double-walled tanks	Interstitial monitor is present and indicates no liquid in interstitial space	Indicator is missing or indicates liquid in the interstitial space	N/A

Secondary containment	Compliant	Needs Corrective Action	Incident
Secondary containment	If outdoors - containment can hold 110% of tank capacity	Containment cannot hold 110% of tank capacity	N/A
Containers	No holes or cracks / only surface scratches	Holes or cracks such that container could not hold contents of tank	N/A
	No liquid or debris	Some liquid or debris	N/A
Nearby drains	A release cannot reach nearby storm drains	A release could reach a nearby storm drain	N/A

If an environmental incident is observed, call the Load Dispatcher at ext. 4451

APPENDIX H

ANNUAL STORM WATER REPORTS

United States Steel Corporation – Gary Works
One North Broadway, MS 70-A
Gary, IN 46402

May 25, 2016

Re: United States Steel Corporation – Gary Works
NPDES Permit IN0000281
Storm Water Annual Review

Per Part I.J.6 of NPDES Permit IN0000281 (effective March 1, 2010), United States Steel Corporation (USS) must submit an annual review of storm water compliance.

For 2015, USS conducted the required sampling, inspections, and comprehensive compliance evaluations. Any corrective actions required from these events are documented in the USS environmental management system. Per the 2015 review, no significant modifications are required to the plant SWPPP.

If you have any questions regarding this submittal, please contact me at 219-888-3369 or via electronic mail at BSMiller@uss.com

Sincerely,

Brandon Miller
Environmental Control
United States Steel Corporation
Gary Works, Midwest Plant, East Chicago Tin

APPENDIX I

SWPPP

Storm Water Discharge Summaries

2011 – 2016

(Previous Permit Term)

USS Midwest Plant - Storm Water Discharge Summary 2011-2016
Appendix I - Storm Water Pollution Prevention Plan (SWPPP)

	001						002						003					
	ph	HEM O&G	Ammonia	TSS	COD	zinc	ph	HEM O&G	Ammonia	TSS	COD	zinc	ph	HEM O&G	Ammonia	TSS	COD	zinc
3/22/2012	7.8	0.52	0.62	3.0	150	0.38												
5/31/2012	7.5	<0.39	0.17	1.6	61	0.15	7.3	<0.39	0.18	2.6	34	0.076	7.6	<0.42	0.10	3.2	<5.5	0.0099
9/17/2012	7.4	0.71	0.084	2.6	167	0.42	7.4	0.47	0.22	2.6	37	0.064	7.7	0.51	0.17	4.2	7.1	0.012
10/17/2012	7.6	0.43	0.02	4.6	49	0.083	7.3	<.39	0.098	6.7	8.6	0.047	7.5	<.38	0.051	2.2	6.4	0.0093
3/15/2013	7.6	<.53	0.69	4.2	78	0.31	7.1	<.39	0.33	7.4	31	0.10	7.4	<.40	0.071	7.4	10	0.008
6/21/2013	7.8	<.41	0.27	1	60	0.12	6.8	<.4	0.077	4	14	0.02	7.6	<.41	0.036	1.2	9.8	0.0097
9/11/2013	8.4	2.1	0.41	20	150	0.13	7.9	1.3	0.34	21	73	0.10	8.1	1.3	0.08	2.8	20	0.027
12/20/2013	7.9	<.63	0.2	12	31	0.32	7.7	1.4	0.21	5.8	9.2	0.02	7.9	0.8	0.022	1.6	<8.0	0.0097
3/19/2014	7.7	1.3	0.17	11	29	0.27	6.8	1.7	0.2	48	44	0.17	7.3	1.2	0.11	5.6	17	0.032
4/21/2014	7.6	<.55	0.38	9.4	7.5	0.08	7.4	1	0.028	1.8	15	0.01	7.7	<.57	0.013	2	13	0.0047
8/19/2014	7.6	0.62	0.096	17	44	0.31	7.4	0.85	0.06	5.4	47	0.04	7.8	<.59	0.025	4	20	0.013
12/22/2014	7.7	1.4	2.8	0.099	26	0.28	7.6	<.39	0.24	6.6	10	0.02	7.9	<0.58	0.22	13	6.5	0.0052
3/25/2015	Outfall 001 Closed/Removed						7.6	1.2	0.038	7.2	3.7	0.062	7.2	<0.91	0.023	4.2	6.2	0.019
6/7/2015	Outfall 001 Closed/Removed						7.8	<.39	0.3	5.1	34	0.06	8	<1.2	0.098	2.7	5.5	0.021
9/18/2015	Outfall 001 Closed/Removed						6.9	<.39	.0.39	1	7.7	0.01	7.3	<1.2	0.017	1.1	11	0.0046
11/17/2015	Outfall 001 Closed/Removed						7.5	<.39	0.096	8	19	0.02	7.8	<1.2	0.065	5.9	15	0.019
3/24/2016	Outfall 001 Closed/Removed						7.8	2.7	0.31	23	32	0.089	7.3	1.4	0.05	4.4	13	0.026
6/15/2016	Outfall 001 Closed/Removed						NA	NA	0.159	1.43	21.00	0.042	NA	NA	0.106	8.86	9.1	0.015
9/26/2016	Outfall 001 Closed/Removed						NA	NA	0.036	0.071	1.7	0.02	NA	NA	0.043	9.8	4.8	0.015
11/2/2016	Outfall 001 Closed/Removed						NA	NA	0.083	15	10	0.05	NA	NA	0.059	7.1	12	0.08

ALL UNITS MG/L except pH

Doc# 70100042EMP
Title: SPCC Program Management
Issue Dt: 09/18/2015
Revision Dt:10/20/2015 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: SPCC Program Management
Loc: Environmental Control Division-Gary Works

1. Scope
   1.1. This standard shall apply to and be understood by all personnel involved with Spill Prevention, Control, and Countermeasure (SPCC) program management, including the responsible Environmental Control manager(s), employees and/or contractors conducting bulk storage container inspections, Division employees responsible for scheduling and completing maintenance and corrective work on bulk oil containers, employees and/or contractors who maintain the SPCC Plan, and the certifying Professional Engineer (PE).

2. Purpose
   2.1. The purpose of this procedure is to provide a general guideline for compliance with SPCC requirements at U.S. Steel Gary Complex.

3. References
   3.1. 40 CFR 112 – SPCC Regulations
   3.2. United States Steel Corporation Gary Works Spill Prevention, Control, and Countermeasure (SPCC) Plan
   3.3. USS Environmental Management Practice, *70100003EMP Incident Reporting*
   3.4. SPCC Inspection Field Checklists

4. Definitions
   4.1. *Oil* means oil of any kind or in any form, including, but not limited to: petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.
   4.2. *Bulk storage container, or storage tank,* means any container used to store oil. These containers are used for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce. Oil-filled electrical, operating, or manufacturing equipment is not a bulk storage container.
   4.3. *Oil storage area* means any space designated for the storage of one or more bulk oil storage containers, including tanks, drums, and/or totes. The number of containers present in storage areas may vary, and storage areas are inspected as a single area, not as individual containers.
   4.4. *Loading station* means the end terminal projected from a bulk oil storage container, usually connected by piping, intended to move oil from the bulk storage container to an end user, such as a mobile refueler or a vehicle.

Doc# 70100008EMP
Title: Oil and Hazardous Substance Loading and Unloading Practices
Issue Dt: 08/09/1996
Revision Dt: 01/03/2014 Review Interval: 12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Oil and Hazardous Substance Loading and Unloading Practices
Loc: Environmental Control Division-Gary Works

could result in harm to the environment and may expose the company and responsible individuals to enforcement actions that could include civil or criminal penalties for violations of environmental laws, rules and/or permit conditions.

Doc# 70100008EMP
Title: Oil and Hazardous Substance Loading and Unloading Practices
Issue Dt: 08/09/1996
Revision Dt: 01/03/2014 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Oil and Hazardous Substance Loading and Unloading Practices
Loc: Environmental Control Division-Gary Works

*6.1.6 Ensure all equipment is functioning as designed. Interim procedures must be developed and approved by the Area Manager or designee prior to deviating from standard operating procedures.

*6.1.7 Immediately terminate material transfer upon evidence of leakage.

*6.1.8 Close all valves before disconnecting hoses and ensure all transfer hoses are disconnected prior to moving vehicle or equipment.

*6.1.9 Where applicable, ensure flexible tank hoses/pipes are placed and maintained inside the secondary containment unit to contain potential leaks and drips.

*6.1.10 Prior to departure, inspect for discharges at all outlets on the vehicle, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

*6.1.11 All drivers must know the clearance height of their vehicle and be aware of overhead pipelines, structures, and utility lines throughout the facility.

*6.2 Bulk Material Transfers of Oil and Hazardous Substances – Equipment

*6.2.1 Departmental Personnel are responsible to ensure that all process piping and equipment is suitable for transfer operations.

*6.2.1.1 Ensure all equipment inspections and verifications are performed at prescribed frequencies.

6.3 Spill Reporting

6.3.1 Upon discovery of a spill, the person responsible for, aware of, or discovering the spill or release must follow the guidelines for incident reporting specified in Environmental Management Practice 70100003EMP. Report all spills to the Load Dispatcher at 219-888-4451.

6.4 Spill Response

6.4.1 All spill response and cleanup including material disposal, shall follow guidelines specified in Environmental Management Practice 70100004EMP.

7.0 Practice Approval

7.1 Approved for Principle and Practice.

Director, Environmental Control

CONSEQUENCES OF NON-COMPLIANCE: Non-compliance with environmental procedures

Doc# 70100008EMP
Title: Oil and Hazardous Substance Loading and Unloading Practices
Issue Dt: 08/09/1996
Revision Dt: 01/03/2014 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Oil and Hazardous Substance Loading and Unloading Practices
Loc: Environmental Control Division-Gary Works

70100008EMP - Loading and Unloading of Oil and Oil Containing Substances

1.0 Purpose

1.1 This practice describes environmental regulatory requirements, aside from normal safety precautions, for loading and unloading oil and hazardous materials at Gary Works.

2.0 Scope

2.1 This practice applies to all personnel, including Suppliers who load or unload bulk oil or hazardous materials at USS Gary Works.

3.0 References

3.1 Gary Works Spill Prevention Control and Countermeasures Plan (SPCC)

3.2 Gary Works Integrated Contingency Plan (ICP)

3.3 Gary Works Facility Response Plan (FRP)

4.0 Definitions

None

5.0 Responsibilities

5.1 Each Business Unit is responsible for ensuring proper loading and unloading of oil and hazardous materials.

6.0 General Practice

6.1 Bulk Material Transfers of Oil and Hazardous Substances – Containment

6.1.1 Delivery drivers are responsible for compliance with all Department of Transportation (DOT) procedures. Drivers must ensure all applicable safety activities are completed for transfer operations such as grounding, pinning, hold downs, chocking wheels, etc. Drivers must also ensure all gaskets, fittings and disconnects are in good operating condition.

6.1.2 If area containment is not present, ensure portable drip pans or trays are in place before transferring material.

*6.1.3 If area is contained, ensure that containment is free of liquids and debris prior to initiating transfer activity.

*6.1.3.1 Properly position truck on containment pad prior to offloading to ensure that any spills will be captured.

*6.1.4 Inspect all outlets and drains on the delivery vehicle prior to transfer of material and ensure all valves are in the correct position prior to transferring material.

*6.1.5 Transfer of material must be manned at all times to ensure prevention of spills and releases from overfill. Reliance on an automatic shut-off nozzle does not exempt the driver from continuously manning the operation. Ensure tank levels are monitored throughout the transfer operation.

Doc# 70100005EMP
Title: Mobile Container Storage, Containment and Inspection
Issue Dt: 08/09/1996
Revision Dt: 05/06/2015 Review Interval: 12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Mobile Container Storage, Containment and Inspection
Loc: Environmental Control Division-Gary Works

6.3.5.1 Transfer lines other than flexible hoses used for refilling equipment shall be hard piped and must be free of leaks and drips.

6.3.5.2 Flexible transfer hoses must be equipped with automatic shut-off nozzles, and when not in use, the entire hose shall be maintained inside the secondary containment unit with the nozzle hanging in an up-right position. All hose connections must be free of leaks and drips.

6.3.5.3 Any overflows must be directed into containment.

6.3.6 Each storage area should be equipped with spill kits of adsorbent/absorbent materials (i.e. Oil Dri ®, absorbent pads, pillows, socks, etc.) to contain and clean-up spilled materials.

6.4 Inspections for Mobile Container Storage Areas

6.4.1 *Inspections of mobile container storage areas are to be performed by the SPCC Maintenance and Inspection designee(s) on a quarterly basis in accordance with the SPCC Plan. The SPCC Professional Engineer will determine the frequency of the inspections. Mobile containers storing hazardous materials may also be stored in these areas and may be inspected as part of the SPCC inspection for that respective mobile container storage area. Ensure the provisions of 6.2.4 are being complied with in these storage areas.

6.5 Material Spills

6.5.1 Upon discovery of a spill from a liquid material storage area, follow the guidelines for spill reporting specified in Environmental Management Practice 70100003EMP, Incident Reporting.

6.5.2 Spill response and cleanup shall follow guidelines specified in Environmental Management Practice 70100004EMP, General Spill Cleanup Guidance.

7.0 Practice Approval

7.1 Approved for Principle and Practice.

Director, Environmental Control

CONSEQUENCES OF NON-COMPLIANCE: Non-compliance with environmental procedures could result in harm to the environment and may expose the company and responsible individuals to enforcement actions that could include civil or criminal penalties for violations of environmental laws, rules and/or permit conditions.

Doc# 70100005EMP
Title: Mobile Container Storage, Containment and Inspection
Issue Dt: 08/09/1996
Revision Dt: 05/06/2015 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Mobile Container Storage, Containment and Inspection
Loc: Environmental Control Division-Gary Works

6.2.2.1 Oils, greases, chemicals, or other contaminants should not be stored in areas that drain and discharge to a clean water sewer.

6.2.3 Each drum/mobile container storage area shall be clearly marked to indicate the type(s) of material that can be stored (i. e., lubricating oils, hydraulic oils, antifreeze, waste oils, etc.). Refer to the appropriate Safety and Industrial Hygiene Procedures for further labeling requirements, such as NFPA placarding.

6.2.4 Under no circumstances are incompatible materials such as acids or caustics to be stored within the same designated area. Materials must be stored forty feet apart or have an impermeable barrier between the incompatible materials.

6.2.5 Drums that are not in use shall be stored in an upright position with bung caps intact. Empty drums must also be stored with bung caps intact.

6.3 Storage Tank Placement and Containment

6.3.1 Mobile storage containers should be placed at least forty (40) feet from any main roadway, sewer, catch basin, drainage ditch, outfall or shoreline. If this isn't possible, then other protective measures, such as secondary containment, must be in place. In addition, storage areas and containment systems must be sheltered from any overhead liquid pipelines.

6.3.1.1 Oils, greases, chemicals, or other contaminants should not be stored in areas that drain and discharge to a clean water sewer.

6.3.2 Each storage area of oil and/or hazardous substances shall be provided with a secondary containment system capable of holding 110% of the volume of the largest container stored within the containment area.

6.3.3 Each secondary containment area must be constructed from either of the following:

(a) Fabricated metal pans with welded seams;
(b) Curbed concrete pads;
(c) Concrete pad with sealed metal sidewalls;
(d) Plastic or fiberglass tubs
(e) Any other equivalent containment system designed to contain stored materials for at least 72 hours.

6.3.4 Each secondary containment unit shall be maintained free of excess accumulations of precipitation, debris, foliage, etc. Accumulated storm water, or storm water mixed with the stored contents, must be disposed in a proper manner (i.e. accumulated storm water mixed with contents of the storage vessel cannot be drained to the ground. Contact the area Environmental Compliance Manager for disposal locations).

6.3.5 Any valve connections, level gauges, etc. must be maintained within the secondary containment unit and must be free of leaks and drips.

Doc# 70100005EMP
Title: Mobile Container Storage, Containment and Inspection
Issue Dt: 08/09/1996
Revision Dt:05/06/2015 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Mobile Container Storage, Containment and Inspection
Loc: Environmental Control Division-Gary Works

70100005EMP - EMS Compliance

1.0 Purpose

1.1 This practice has been developed as guidance to achieve compliance with regulatory requirements and Gary Works Environmental Management System (EMS). This practice, when properly implemented, will prevent releases from drums and bulk/mobile storage containers. Each business unit may supplement this practice as necessary.

2.0 Scope

2.1 This practice applies to all Gary Works personnel whose job activities include the use, storage or transportation of material in drums and bulk/mobile storage tanks.

3.0 References

3.1 Gary Complex Spill Prevention Control and Countermeasure (SPCC) Plan

4.0 Definitions

4.1 A mobile storage container is any container designed to store oil, grease, or a chemical product in quantities which allow movement of the container. Mobile storage containers include drums, totes, pails, portable tanks, and other similar containers.

5.0 Responsibilities

5.1 Business Unit management is responsible for ensuring the implementation of this practice and ensuring the accuracy of drum and storage tank inventories.

5.2 *The Environmental Control Department is responsible for providing assistance and monitoring performance on implementation of this practice through the SPCC Plan inspections and corrective action follow up.

6.0 General Practice

6.1 Drum and Storage Tank Inventories

6.1.1 Environmental Control maintains an inventory of designated storage areas for drums, totes and other mobile oil storage containers in accordance with SPCC requirements (hazardous material containers may or may not be included in this inventory of designated storage areas).

6.2 Drum Placement and Containment

6.2.1 Each Business Unit shall utilize established drum/mobile container storage areas.

6.2.2 Each drum/mobile container storage area should be placed at least forty (40) feet from any main roadway, sewer, catch basin, drainage ditch, outfall, or shoreline. If this isn't possible, then other protective measures, such as secondary containment, must be in place. In addition, storage areas and containment systems must be sheltered from any overhead liquid pipelines.

Doc# 70100004EMP
Title: General Spill Cleanup Guidance
Issue Dt: 08/09/1996
Revision Dt: 05/26/2015 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: General Spill Cleanup Guidance
Loc: Environmental Control Division-Gary Works

6.3.5.1 *Practices for spills of process materials and waste streams depend on the nature of the chemical or mixture of chemicals released and magnitude of the spill event. Contact Environmental Control for specific guidance.

6.3.6 Disposal of Spill Cleanup Materials

6.3.6.1 Residual materials from spill cleanup activities must be disposed in accordance with the following established disposal Practices:

- 70100015EMP Waste Characterization And Classification Guidance
- 70100013EMP Internal Waste Shipment Bill of Lading Manifesting Guidance
- 70100019EMP Hazardous Waste Shipping/Disposal Guidance

7.0 Practice Approval:

7.1 Approved for Principle and Practice.

Director, Environmental Control

CONSEQUENCES OF NON-COMPLIANCE: Non-compliance with environmental procedures could result in harm to the environment and may expose the company and responsible individuals to enforcement actions that could include civil or criminal penalties for violations of environmental laws, rules and/or permit conditions.

Doc# 70100004EMP
Title: General Spill Cleanup Guidance
Issue Dt: 08/09/1996
Revision Dt:05/26/2015 Review Interval:12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: General Spill Cleanup Guidance
Loc: Environmental Control Division-Gary Works

6.3 Spill Cleanup

6.3.1 Persons responsible for implementing this general practice can obtain specific spill cleanup guidance by contacting the Environmental Control Department to determine: the hazards of the material, the method for clean up, waste determination (hazardous or non-hazardous), appropriate containers for storage, labeling requirements and disposal locations. Do not contaminate the spill clean up material with hazardous waste.

6.3.2 Oil, Glycol and Organic Liquid Spill Cleanup

6.3.2.1 If oil, glycol or organic liquid is spilled onto an impervious surface, the spilled material shall be cleaned up using a vacuum truck or absorbent materials depending on the volume and characteristics of the spilled material.

6.3.2.2 If oil, glycol or organic liquid is spilled onto unlined surfaces, use a vacuum truck or absorbent materials to first recover standing liquids.

6.3.2.3 Spent absorbent materials must be placed in appropriate, dedicated containers for proper disposal of special waste.

6.3.2.4 Visually impacted soil must be removed by excavation.

6.3.2.5 Excavated soils/fill and absorbent materials must be placed in appropriate, dedicated containers for proper disposal of special waste.

6.3.3 Acid/Caustic Spill Cleanup

6.3.3.1 If acid/caustic is spilled onto an impervious surface and standing liquids can be recovered for re-use, the spilled acid/caustic should be collected and returned to the process.

6.3.3.2 *If the spilled acid/caustic cannot be re-used, the acid/caustic and contaminated soil must be neutralized to a pH range of 6 - 8 and disposed of properly (see 6.3.5 below) after waste characterization. Contact Environmental Control for specific guidance.

6.3.4 Tar spill clean up

6.3.4.1 If absorbent material is required to facilitate clean up of tar then coal or coal fines must be used in order for the spilled material to be suitable for recycle. Do not use slag or other such material.

6.3.4.2 Ensure tar spill clean up is placed in tar recycle boxes only. Do not contaminate other material or place other unaffected material in recycle boxes.

6.3.5 Spill Cleanup for Process Materials and Waste Streams

Doc# 70100004EMP
Title: General Spill Cleanup Guidance
Issue Dt: 08/09/1996
Revision Dt: 05/26/2015 Review Interval: 12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: General Spill Cleanup Guidance
Loc: Environmental Control Division-Gary Works

70100004EMP - Spill Cleanup

1.0 Purpose:

1.1 This guidance document is to assist Gary Works personnel whose responsibilities include the cleanup of spilled materials. This document can also be referenced by contractors or outside organizations as guidance when developing their own practices for cleanup of spilled materials.

2.0 Scope:

2.1 This document applies to all personnel whose job activities include spill cleanups and/or the management and oversight of spill cleanups.

3.0 References:

3.1 USS Gary Works Integrated Contingency Plan (ICP)

3.2 USS Environmental Management Practice "Incident Reporting", 70100003EMP

3.3 USS Environmental Management Practice, "Waste Characterization and Classification Guidance", 70100015EMP

3.4 USS Environmental Management Practice "Internal Waste Shipment Bill of Lading Manifesting Guidance", 70100013EMP

3.5 USS Environmental Management Practice "Hazardous Waste Shipping/Disposal Guidance", 70100019EMP

4.0 Definitions:

None

5.0 Responsibilities:

5.1 All employees are responsible for ensuring the implementation of this practice. The Environmental Control Department will provide assistance and monitor implementation of this practice.

6.0 General Practices:

6.1 Spill Reporting

6.1.1 Upon discovery of a spill, follow the guidelines for incident reporting (see 70100003EMP).

6.2 Spill Containment

6.2.1 If the spill is of a continuing nature and/or has potential for further environmental impact, a containment structure must be constructed to minimize adverse impacts. The structure must be of a size and material to contain the spill until a method of removal can be established.

Doc# 70100003EMP
Title: Environmental Incident Reporting
Issue Dt: 08/09/1996
Revision Dt: 06/10/2014 Review Interval: 12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Environmental Incident Reporting
Loc: Environmental Control Division-Gary Works

Load Dispatcher at 888-4451 (Gary and East Chicago) – for the Midwest Plant call 763-5151.

6.1.2 The incident is also to be communicated to the responsible individual's supervisor.

6.1.3 The following information must be communicated to the Load Dispatcher:

(a) Name, division and plant telephone extension of the individual reporting the incident;

(b) Identity of the substance released; i.e., gasoline, diesel fuel, lubricating oil, hydraulic fluid, antifreeze, coke oven gas, PCB, etc;

(c) Identify the physical state of the substance released (i.e. solid, liquid, gaseous) and any known characteristic of the substance released; if possible (i.e. flammability, corrosivity, volatility, toxicity, etc.)

(d) The medium or media into which the release occurred; i.e., land, water, air, plant sewers, secondary containment, etc.;

(e) An estimate of the quantity released, if possible;

(f) An estimate of the area (in square feet) affected by the release;

(g) Time and duration of the release;

(h) The exact location of the release; and

(i) Whether additional assistance, such as from the Hazardous Materials Responders, is required.

6.2 The Load Dispatcher will contact the Environmental Control Manager on duty and record the call in the Environmental Incident Reporting System.

7.0 Practice Approval

7.1 Approved for Principle and Practice:

Director, Environmental Control

CONSEQUENCES OF NON-COMPLIANCE: Non-compliance with environmental procedures could result in harm to the environment and may expose the company and responsible individuals to enforcement actions that could include civil or criminal penalties for violations of environmental laws, rules and/or permit conditions.

Doc# 70100003EMP
Title: Environmental Incident Reporting
Issue Dt: 08/09/1996
Revision Dt: 06/10/2014 Review Interval: 12
Cat: Environmental Doc Type: EMP
Auth: EMR
Desc: Environmental Incident Reporting
Loc: Environmental Control Division-Gary Works

70100003EMP - Environmental Spills and Releases

1.0 Purpose

1.1 This practice has been developed as guidance for reporting spills and environmental releases. This practice, when properly implemented, will ensure that releases of oil and/or hazardous substances are reported properly.

2.0 Scope

2.1 This practice applies to all Gary Works personnel whose job activities could result in an environmental spill or release, or the discovery of an environmental spill or release.

3.0 References

3.1 U. S. Steel Gary Works Integrated Contingency Plan

4.0 Definitions

4.1 Environmental Incident is a release of any substance that escapes the process or equipment with potential impact to air, land or water, including releases to secondary containment, sewers and impervious surfaces.

4.2 Secondary containment is a safeguarding practice used to prevent the unauthorized release of toxic or hazardous substances from the primary containment (tank) into work areas (i.e. cement walls or poly container that is 110% of the volume of the tank it is containing).

4.3 Flammability is the measure and degree by which a chemical substance will burn or ignite, causing fire or combustion.

4.4 Corrosivity is the measure and degree by which a chemical substance will corrode or deteriorate other substances; either as an acidic corrosive and/or a caustic (basic) corrosive.

4.5 Volatility is the measure and degree by which a liquid and/or solid state chemical substance is converted to a gaseous state.

4.6 Toxicity is the measure and degree by which a chemical substance can sicken and damage a living organism.

5.0 Responsibilities

5.1 All personnel, including contractors and suppliers, are responsible for ensuring the implementation of this practice within Gary Works.

5.2 The Environmental Control Department will monitor Gary Works performance with respect to this practice.

6.0 General Practice

6.1 Incident Reporting

6.1.1 If a spill or environmental release occurs, the person responsible for or discovering the release must immediately communicate the incident to the

APPENDIX F

Procedures

USS - Midwest Plant SPCC Plan - Appendix E
Non-Destructive Integrity Testing Tank List

Tank ID	Common Name	Capacity (gal)	Contents	Containment Material	Foundation Type	Age or Date Installed	Known Problems? (Y or N)	Shop Built? (Y or N)	Other Equivalent Protection? (Y or N)	Risk to Water	If round tank, Tank Dia. (ft)	If non-round tank, Tank Width (ft)	Tank Length/ Height (ft)	Insulated? (Y or N)	Elevation from Mill Floor (ft)	Test Type	Last Completed Test Date	Next Scheduled Test Date
CRS-5-TK14 A	80" CRM Rolling Oil Tank	9,000	Rolling Oil	Indoors	Steel Saddles	1960-70s	No	Y	Y	Low	11		12.5	Y	0	Integrity	2012	PE Comparitive Analyisis will be conducted after consistent test data obtained.
CRS-5-TK14 B	80" CRM Rolling Oil Tank	9,000	Rolling Oil	Indoors	Steel Saddles	1960-70s	No	Y	Y	Low	11		12.5	Y	0	Integrity	2012	
PKLM-TK27	Pickle Coating Oil Tank	13,500	Coating Oil	Indoors	Steel Saddles	2004	No	Y	Y	Low	10		23	Y	5	Integrity	NA	
Total No. of Tanks: 3																		Revision Date: 01 Jun 2016

PKLM-TK27 is a fairly new tank and it has been determined that a 10-yr interval is adequate for integrity testing.

APPENDIX E

Integrity Testing List

Herbicides, Pesticides and Fertilizers			
		Locations	
Product Name	Type of Product	East Side SWMU	Greenbelt II Landfill
Pathfinder II	Herbicide	X	X

Note: Hand held applications are done for grounds maintenance throughout the plant using "Round Up"-type herbicides.

Rev Date: 01/31/2014

APPENDIX D

Pesticide, Herbicide & Fertilizer Application

Local and Community Emergency Notifications

Agency / Emergency Personnel	Phone Number	Authorized to Call
Local Emergency Planning Committee (LEPC) Porter Sheriff – after 4 pm	(219) 465 – 3593 8am–4pm (219) 477 – 3170	Environmental
Portage Fire Department	(219) 762 - 7404	Security
City of Portage, Sanitary Sewer Dept, Treatment Plant	(219) 762 - 1301 (219) 406 - 1205 (mobile, treatment plant mgr)	Environmental

Emergency Response Contractors

Contractor	Telephone Number	Response Time	Contract Responsibility
Heritage Remediation Engineering, Inc. 24-hr (toll-free)..... 24-hr ..... Office..... Fax.....	 (800) 487 - 7455 (219) 885 - 8014 (630) 739 - 1151 (630) 739 - 9191	Within 2 hours	Spill Response and Remediation
KM Plant Services Gary Office..... Highland, IN Office.....	 (219) 882 - 0060 (219) 933 - 1100	Within 2 hours	Spill Response and Remediation

Facility Emergency Contacts

ORGANIZATION/CONTACT	PLANT PHONE (OR 219-763-XXXX)
Energy Load Dispatcher (LD)	5151
Plant Security	5911
Plant Safety	5376
Industrial Hygiene	5376
Emergency Responders	
Fire Department..... Ambulance.....	5911 5911
Environmental Emergency Coordinators	
Director, Environmental Control	SteelCom 8-444-4500 or (219) 888-4500
Environmental Compliance Manager – Midwest	5869
SPCC Manager, Environmental Control	SteelCom 8-444-3432 or (219) 888-3432 SteelCom 8-444-7938 or (219) 888-7938
On-Duty Environmental Manager	Contact LD

Federal and State Agency Notifications

AGENCY / EMERGENCY PERSONNEL	PHONE NUMBER	AUTHORIZED TO CALL
National Response Center (NRC)	(800) 424 - 8802	Environmental
Indiana Department of Environmental Management	(888) 233 - 7745	Environmental
U.S. Environmental Protection Agency - Region V (US EPA)	(312) 353 - 2318	Environmental
U.S. Coast Guard (USCG)	(219) 879 - 8371 [Michigan City, IN Station] (773) 768 – 4093	Environmental

Storm Water Pollution Prevention Team

Area	Operating/Maintenance Area Personnel & Responsibility	Environmental Control Personnel & Responsibility
Plant SWPPP Administrator and Responsible Mgmt	Midwest Plant Area Manager - Plan implementation, maintenance, compliance, resources and training	Midwest Plant Env Compliance Manager and Water Compliance Manager - Plan development, compliance and implementation
Landfill	Utilities and Environmental Control personnel - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Repair Shops and Garages	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Contractors	Onsite Contractor Facilities - Develop plans, compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Pickle Line	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Sheet Production Areas	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Tin and Chrome Production Areas	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
WWT Facilities	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Utilities	Division Manager or Designee - Compliance and implementation, training	Midwest Plant Env Compliance Manager - Compliance and implementation
Contractor-ST Environmental	ST Environmental Personnel - Quarterly SWP3 inspections, plan development and maintenance	Midwest Plant Env Compliance Manager - Quarterly inspections, plan development and maintenance

APPENDIX C

SWPPP Team Members Notification Lists

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 104 and 004 Drainage Areas

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Loading/ unloading zone	4	Sludge Dewatering	Op Services	Utilities	Sludge Dewatering	Lime Slurry	Transfer operation;Overfill	Proximity to sewers, Grassy area	Loading/unloading procedures	Low	None
Loading/ unloading zone	4	Sludge Dewatering	Op Services	Utilities	Sludge Dewatering	MgOH	Transfer operation;Overfill	Proximity to sewers, Grassy area	Loading/unloading procedures	Low	None
Heavy Equipment Parking and Repair	5	Transportation Garage	Op Services	Transportation	Transportation	Oil, Grease, particulates, Gasoline, kerosene, diesel	Leak/ spill, overfill	Building	None	Low	None
Sawdust	5	Carpenter Shop	Op Services	Utilities	Carpenter Shop	Particulates	Wind, Spill	Building	None	Low	None
Packer Box	4	UT-11, North End	Op Services	Utilities	UT-11	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	4	Final Treat North	Op Services	Utilities	Final Treat	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	5	TMP Parking Lot	Tin	Parking Lot	TMP Parking Lot	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	4	Boiler House, North Door	Op Services	Utilities	Boiler House	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	4	Final Treat South	Op Services	Utilities	Final Treat	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	4	AE-8, NW End	Op Services	Utilities	AE-8	Waste	Pickup, Overfill	None	Waste Management	Low	None
Sludge Filter Cakes (Hazardous Wastes)	3	Greenbelt II Landfill	N/A	Environmental	Greenbelt II Landfill	Oil, Grease, Metals, particulates	Leak/spill, transfer operations	Isolated Drainage Area, Storm Water Accumulation is pumped to Final Treat	Weekly Inspections	Low	None
Sludge Filter Cakes (Hazardous Wastes)	2, 3	Greenbelt I Landfill	N/A	N/A	Greenbelt I Landfill	Oil, Grease, Metals, particulates	None, Landfill no longer in use	Landfill closed and capped, belongs to National Steel Trust	Inspections	Low	None
Unknown buried waste	3, 6	Eastside SWMU	N/A	Environmental	Eastside SWMU	Oil, Grease, Metals, particulates	None, Area closed	Area closed and capped	Inspections	Low	None
Assorted Hazardous Waste	3	PCB Shed	N/A	Environmental	W-33	Mercury, Chrome, Acid, Aerosols	Transfer operations	Building and berms	Weekly Inspections	Low	None
Oily Waste Pad	3	Oily Waste Pad	Contractor	K&M	Y-10	Oil, Grease, Particulates	Transfer operations	Berms	loading/unloading procedures, solidified and transported to landfill on a regular basis	Low	None
750,000 Gallon Tank	3	West of GBII	Op Services	Utilities	XY-4	Storm Water, GB II Leachate	Overfill	Secondary Containment	None	Low	None
20 yard rolloff	3	Road to Landfill, Across from OWP			X-6	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff	4	Final Treat	Op Services	Utilities	Final Treat	Waste	Pickup, Overfill	None	Waste Management	Low	None
1000000 Gallon Tank	4	Final Treat (South)	Op Services	Utilities	Final Treat	NA	NA	Not in use	None	Low	None
Loading/ unloading	5	Pretreat	Op Services	Utilities	Pretreat	Sodium Bisulfite	Transfer Operations	Isolated Drainage Area	Loading/unloading procedures	Low	None
Loading/ unloading	5	Pretreat	Op Services	Utilities	Pretreat	Caustic	Transfer Operations	Isolated Drainage Area	Loading/unloading procedures	Low	None
Loading/ unloading	5	Pretreat	Op Services	Utilities	Pretreat	Sodium Bisulfite	Transfer Operations	Isolated Drainage Area	Loading/unloading procedures	Low	None
Loading/ unloading	5	Pretreat	Op Services	Utilities	Pretreat	ChemTreat Chemicals (2)	Transfer Operations	Isolated Drainage Area	Loading/unloading procedures	Low	None
Loading/ unloading	5	API/ Oil Intercepter	Op Services	Utilities	J-138	Chemtreat P841L, P817E	Transfer operations	Isolated Drainage Area	Loading/unloading procedures	None	None

Revision Date: 08/10/2015

Outdoor transformers are inspected quarterly under 40 CFR 761 requirements. Refer to PCB Program for details. None pose a direct risk to storm waters.
All storage tanks and transfer areas are inspected quarterly under the 40 CFR 112 requirements. Refer to SPCC Program for details. None pose a direct risk to storm water.

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 104 and 004 Drainage Areas

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Tank	5	ETLM-TK10	Tin	Tin Line	F-87	Hydraulic oil	Transfer operation;Overfill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETLM-TK11	Tin	Tin Line	F-87	Hydraulic oil	Transfer operation;Overfill	Portable containment	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TMTM-TK07	Tin	Tin Temper Mill	F-133	Hydraulic oil	Overfill	Pit/tray	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TMTM-TK08	Tin	Tin Temper Mill	G-133	Hydraulic oil	Transfer operation;Overfill	Portable Containment/Building/ Mill Floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TMTM-TK09	Tin	Tin Temper Mill	G-135	Lubrication	Transfer operation;Overfill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TMTM-SA02	Tin	Tin Temper Mill	F-137	Various Oils & Grease	Leak/spill; Transfer operation	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TMTM-SA03	Tin	Tin Temper Mill	F-137	Various Oils & Grease	Leak/spill; Transfer operation	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TMTM-SA01	Tin	Tin Temper Mill	G-137	Various Oils & Grease	Leak/spill; Transfer operation	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CONT-ST-TK05 (formerly STC-TK01)	Op Services	Transportation	North of Delray Building	Diesel	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Potential spills and leaks from delivery trucks	4	TMP Parking Lot Manhole	Tin	Tin Mill	TMP Parking Lot	oils, fuels, delivered chemicals	leaks/spills have potential to impact 004 storm sewer directly via open grate manhole	None feasible	-Quarterly Inspections -Posted warning sign/procedure -Spill Kit near area	Low	None
Potential spills and leaks from delivery trucks	4	Manhole CB1 in Final Treatment Area	Utilities	Utilities	Final Treat	oils, fuels, delivered chemicals	leaks/spills have potential to impact 004 storm sewer directly via open grate manhole	None feasible	-Quarterly Inspections -Posted warning sign/procedure -Spill Kit near area	Low	None
Potential spills and leaks from vehicles	5	Manholes along Portside Facility roadway	MWP	MWP	Portside Energy	oils, fuels, delivered chemicals	leaks/spills have potential to impact 004 storm sewer directly via open grate manhole	None feasible	-Quarterly Inspections -Posted warning sign/procedure -Spill Kit near area	Low	None
Loading/ unloading zone	4	Final Treat (North)	Op Services	Utilities	Final Treat	Lime Slurry	Transfer operation;Overfill	Containment	Loading/unloading procedures	Low	None
Loading/ unloading zone	4	Final Treat (North)	Op Services	Utilities	Final Treat	ChemTreat Chemicals	Transfer operation;Overfill	Containment	Loading/unloading procedures	Low	None
Loading/ unloading zone	4	Final Treat (North)	Op Services	Utilities	Final Treat	Sulfuric Acid	Transfer operation;Overfill	Containment	Loading/unloading procedures	Low	None
Loading/ unloading zone	4	Lake Pumphouse	Op Services	Utilities	Lake Pumphouse	Sodium Hypochlorite	Transfer operation;Overfill	Building, Berm to north	Loading/unloading procedures	Low	None

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Tank	5	ETCM-TK22	Tin	Chrome Line	E-95	Used oil	Leak/spill;Transfer operation;Overfill	Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	ANCA-SA03	Tin	Continuous Anneal	G-119	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ANCA-TK01	Tin	Continuous Anneal	G-101	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ANCA-TK04	Tin	Continuous Anneal	G-119	Hydraulic Oil	Transfer operation;Overfill	Catch Basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	DCRM-SA01	Tin	DCR Mill	F-131	Lubrication	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	DCRM-SA05	Tin	DCR Mill	G-123	Lubrication	Leak/spill;Overfill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	DCRM-TK09A, TK09B, TK09C	Tin	DCR Mill	F-125	Hydraulic oil	Transfer operation;Overfill	Portable Containment/Building/ Mill Floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	DCRM-TK10	Tin	DCR Mill	F-125	Hydraulic oil	Leak/spill;Valve(s);Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	DCRM-TK11A, TK11B	Tin	DCR Mill	F-129	Rolling oil	Leak/spill;Valve(s);Transfer operation;Overfill	Pit/tray	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	DCRM-TK13	Tin	DCR Mill	G-125	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Building/Basement	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	RCL2-SA02	Tin	Recoil #2	E-132	Lubrication	Leak/spill;Valve(s);Transfer operation;Overfill	Portable Containment/Building/ Mill Floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	RCL2-SA03	Tin	Recoil #3	E-127	Various Oils		Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	RCL2-TK01	Tin	Recoil #4	E-129	Hydraulic oil	Leak/spill;Valve(s);Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	ETLM-SA02	Tin	Tin Line	F-87	Coating oil	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETLM-TK01	Tin	Tin Line	F-113	Hydraulic oil	Leak/spill;Valve(s);Transfer operation;Overfill	Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETLM-TK02	Tin	Tin Line	F-113	Hydraulic oil		Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETLM-TK09	Tin	Tin Line	F-87	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 104 and 004 Drainage Areas

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Storage area	5	CM-SA03	Op Services	Utilities	H-121	Various Oils	Leak/spill	Pit/tray	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	FP-TK01	Op Services	Utilities	K-85	Fuel	Leak/spill;Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	FP-TK02	Op Services	Utilities	K-85	Fuel	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	4	FTS-SA01	Op Services	Utilities	N of Clarifier	Gear Oil	Transfer operation;Overfill	Pan	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	PWWT-SA02	Op Services	Utilities	K-139	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	4	ULPH-SA01 (UTPH-SA01?)	Op Services	Utilities	Lake Pumphouse	Various Oils	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training -Signage posted prohibiting chemicals/oils inside pumphouse	High	None
Storage area	5	PKLM-SA12	Sheet	Pickle Line	P-103	Various Oils, Kerosene	Leak/spill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	5	PKLM-LD02	Sheet	Pickle Line	M-103	Hydraulic oil	Leak/spill;Transfer operation	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Loading/ unloading	5	PKLM-LD04	Sheet	Pickle Line	L-115	Hydraulic oil	Transfer operation	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	PKLM-TK14, TK15, TK29, TK30	Sheet	Pickle Line	N-109	Hydraulic oil	Leak/spill;Manhole;Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	PKLM-TK31	Sheet	Pickle Line	M-111	Hydraulic oil	Leak/spill	Building; storm sewer manhole is sealed	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	PKLM-TK32	Sheet	Pickle Line	M-105	Hydraulic oil	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TFG-SA01	Tin		E-1	Hydraulic oil	Transfer operation;Overfill	Building	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	ETCM-SA09	Tin	Chrome Line	D-93	Hydraulic oil	Transfer operation;Overfill	Pan	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETCM-TK02	Tin	Chrome Line	E-105	Hydraulic oil	Transfer operation;Overfill	Portable containment; Building/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	ETCM-TK05	Tin	Chrome Line	E-91	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Drip pan; Basement/mill floor	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 104 and 004 Drainage Areas

Outfall 104 & 004 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
Various within the drainage area	2,3,4,5,6	All 004 drainage areas	N/A	N/A	Outfall 004	Foam from various sources	Direct to Outfall	None, treatment of outfall with antifoam as needed, see 70100036EMP.	Procedure 70100036EMP Storm Water Chemical at Midwest; routine visual observations during storm events by Test America.	Low	None
Tank	5	CONT-AMS-TK01	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CONT-AMS-TK02	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CONT-KM-TK03	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	CONT-KM-TK04	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	TRANS-SA01	Op Services	Transportation	SE Corner of Transportation Garage	Used oil	Transfer operation	Berm	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK01	Op Services	Transportation	SE Corner of Transportation Garage	Fuel	Leak/spill;Valve(s);Transfer operation	Curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK02	Op Services	Transportation	SE Corner of Transportation Garage	Lubrication	Leak/spill;Transfer operation;Overfill	curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK03	Op Services	Transportation	SE Corner of Transportation Garage	Hydraulic oil	Leak/spill;Transfer operation;Overfill	Curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK04	Op Services	Transportation	SE Corner of Transportation Garage	Hydraulic oil	Leak/spill;Transfer operation	Curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK05	Op Services	Transportation	SE Corner of Transportation Garage	Transmission fluid	Leak/spill	Curbing	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK06	Op Services	Transportation	SW of Transportation Garage	Diesel	Transfer operation;Overfill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK08	Op Services	Transportation	SW of Transportation Garage	Gasoline	Transfer operation;Overfill	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK09	Op Services	Transportation	SW of Transportation Garage	Biodiesel	Leak/spill	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Tank	5	TRANS-TK11	Op Services	Transportation	SW of Transportation Garage	Used oil	Leak/spill;Transfer operation;Overfill	Concrete dike	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	CM-SA01	Op Services	Utilities	H-111	Various Oils	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None
Storage area	5	CM-SA02	Op Services	Utilities	H-117	Various Oils	Leak/spill	Catch basin	-Quarterly Inspections -Loading/unloading procedures -Spill prevention training -Storm water pollution prevention training	Low	None

OUTFALL 104 & 004 DRAINAGE AREAS

USS MIDWEST SWPPP
APPENDIX B - SOURCE INVENTORY
OUTFALL 003 DRAINAGE AREAS

Outfall 003 Drainage Areas											
Activity or Source	MAP Section	Source ID/ Common Name	Div	Dept	Location	Significant Material(s) /Pollutants	Exposure Method/Pathway	Structural Controls	Non-Structural Controls / BMPs	Storm Water Risk Level	Planned or Recommended Measures
20 yard rolloff (1-5)	2	Coil Pad Road	Op Services	Transportation	S-42	Metal Scrap	Pickup, Overfill	Storage of empty rolloffs or unidentified waste	Waste Management	Low	None
Packer Box	2	Material Control, NW	Op Services	Transportation	M-56	Waste	Pickup, Overfill	None	Waste Management	Low	None
Packer Box	2	HNX Building, Door 35	Op Services	Transportation	K-53	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff	5	Pickle Line, Door 37	Sheet	Pickle Line	L-64	Waste	Pickup, Overfill	None	Waste Management	Low	None
20 yard rolloff	5	Pickle Line, Door 38	Sheet	Pickle Line	L-64	Metal Scrap	Pickup, Overfill	None	Waste Management	Low	None

Revision Date: 03/31/2017

Outdoor transformers are inspected quarterly under 40 CFR 761 requirements. Refer to PCB Program for details. None pose a direct risk to storm waters.
All storage tanks and transfer areas are inspected quarterly under the 40 CFR 112 requirements. Refer to SPCC Program for details. None pose a direct risk to storm water.